Final Project Closeout Report
For
Building 865 Cluster

Revision: 0

March, 2004

Remediation, Industrial D&D, and Site Services
Kaiser-Hill Company, LLC

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I. Introduction

The 865 Cluster was located on the east half of Rocky Flats Environmental Technology Site (RFETS), just south of Central Ave on 9th Street (see RFETS Plot Plan, Appendix 1). The structures within the 865 Cluster consisted of the main facility, Building 865, which consisted of the low-bay and the high-bay. The low-bay was a 17' high by 82' wide by 152' long structure which housed administrative offices, shower facilities, and metal working labs used for fabrication and research on Depleted Uranium (DU), Beryllium (Be), Stainless Steel (SS), and other metals. The low-bay was constructed primarily of concrete block on concrete slab. The high-bay housed the main production areas for DU, Aluminum (Al), SS, and Be operations including hammering, rolling, heat treating, etc. The dimensions of the high-bay were 34' high by 152' square and was constructed of pre-cast concrete walls 6-8" thick, a 2" poured concrete roof on reinforced slabs with foam and neoprene barriers. The poured slab is nominally 6" thick with various pits, sumps, and trenches along with footers at a depth of 3'. Other structures in this cluster included Building 863 substation building, C865 a cooling tower, Building 866 a waste processing facility housing waste storage tanks and sumps and two ventilation plenum (B867 and B868). See the Cluster Map (Appendix 1, Article 2) for building locations and building additions. In general, the D&D effort required dismantlement and removal of production equipment and interior surfaces, removal of all cluster structures, supporting structures, utilities, and site restoration.

The 865 Cluster Closure Project was completed in accordance with the Rocky Flats Cleanup Agreement (1996), the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities (DOE 2002c); and the RSOP for Facility Disposition (DOE 2000b). This document summarizes the actions taken and the final condition of the Building 865 Cluster.

865 Cluster Description

Building 865 was a one-story, rectangular structure. Overall floor space was approximately 37,980 square feet. The building was divided into two areas. The north side of the building (12,000 square feet) housed offices, a laboratory, a machine shop, a maintenance shop, and a utility room. The north side of the building, referred to as the low bay, covered an area of 82' x 152'. The south side of the building was a high-bay area (23,000 square feet) that housed metal working operations. The high-bay area, twice as high as the north area, contained a small mezzanine that supported ventilation equipment. The high-bay area was a radiological control area, where the use of personal protective equipment was required. Operations in this building included machining activities on DU, Be, A1, SS, and other metals.

The main foundations of the building consisted of concrete casements and pilings tied to bedrock, which supported a cast-in-place beam floor. The general shop section had concrete columns with tilt-up twin-tee panels and a twin-tee roof, topped with a poured concrete topping and build-up roofing. There was Styrofoam insulation on all interior wall surfaces. The office and laboratory section was constructed of concrete block walls and steel interior columns, with twin-tee roofing similar to the general shop section. The addition Rooms 171 and 172 (approximately 3,000 ft^2) were steel frames with insulated metal walls and roofs. There was no basement; however, there were a number of pits under or adjacent to some of the larger pieces of equipment.

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The supply ventilation system for Building 865 consisted of two supply filter units and two fans FU-1/F-1 and FU-2/F-2, located on the general shop mezzanine. The process exhaust duct drawing from the enclosures and "gloveboxes" where uranium and beryllium were directly worked was connected to the two-stage High Efficiency Particulate Air Filter (HEPA) filter plenum, FU-4, located in Building 867. Most of the process exhaust duct was round sheet metal, with the major headers on the south and west walls of the general shop. The building exhaust for the general shop area was provided by a two-stage HEPA filter plenum, FU-3, located in Building 868. The building ventilation in the general shop was provided with supply and exhaust ducts and registers arrayed along the north-south interior columns; there was no ventilation partition between areas in the general shop. The Metallurgy Laboratory and the Research & Development Shop (R&D) and Maintenance Shops exhausted via the process and building exhaust; all other office and laboratory rooms exhausted via EF-4, which was unfiltered.

Along with Building 865, the Building 865 Complex consisted of:

- Building 867, West Filter Plenum, which was constructed in 1972 and was located at the southwest corner of Building 865. It provided exhaust filtration for the more contaminated systems in the general shop and other areas, including local exhaust for the extrusion press, the scrubber, and the beryllium electro-refining process area. The original Building 867 single-stage plenum was expanded and upgraded to a two-stage HEPA plenum in 1985. The plenum was 2,809 square feet of square steel tube and steel sheet construction, and located on a reinforced concrete slab.
- Building 868, East Filter Plenum, was constructed in 1972 and was located at the southeast corner of Building 865. It provideed room exhaust filtration for the general shop area, the Metallurgical Laboratory, the R&D and Maintenance Shops. The original Building 868 single-stage plenum was expanded and upgraded to a two-stage HEPA plenum in 1985. The plenum is 2,130 square feet of square steel tube and steel sheet construction, and located on a reinforced concrete slab.
- Building 866, Process Waste Transfer Station (PWTS), was located immediately west of Building 865. An original Building 866 was part of the original 1972 construction, but the building was essentially rebuilt in 1981 as part of the new process waste system. The 430 square-foot building had insulated metal panel walls and roof, and a reinforced concrete slab with spread and continuous footings and a sump. It contained five process waste tanks, two of which were removed in 1998, and associated pumps and piping.
- Building 863, Extrusion Press Substation, is 400 square feet in area, located south of Building 865. It was a single-story, prefabricated metal building constructed on a reinforced concrete slab that was built in 1984.
- Building C865, Cooling Tower, located west of Building 865, was part of the original 1972 construction. The tower was located on a reinforced concrete slab of about 290 square feet.

II. Action Description

Prior to the mobilization of the D&D Subcontractor, Environmental Chemical Corporation (ECC), the installation of support trailers were required as part of the D&D Project Specifications for project management, administrative support, project

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engineering, radiological operations, occupational safety & health, men's and women's locker rooms (shower facilities), and a break trailer for daily briefings, training, meetings and lunch area for project personnel.

Utility "tie-ins" were required for electrical power, domestic water and sanitary sewer to the trailers. Electrical distribution from the Site 13.8kVa grid was provided by GASH Electric under the Site guidelines and KH/RISS Engineering and Planning approval. The awarded subcontractor for D&D, ECC routed sanitary and domestic water distribution from the locker room trailers and tied-into the Site utility systems under Site guidelines and project specifications for utility tie-ins.

Several walkdowns were performed by GASH Electric and KH/RISS Electrical Engineers and Planners (prior to ECC's Site mobilization) for the development of work packages to remove power to B865. The electrical removal, herein referred to as "cold and dark", is to remove the "original" electrical power distribution provided to all electrical systems, transformers, HVAC Systems, lighting, alarms, and equipment associated with B865, including support Buildings, e.g., B863 Waste Transfer Station, B865 Cooling Tower, both Building Plenums (B867-West and B868-East), and any other B865 ancillary out-buildings, sump-pumps, and equipment sub-stations.

GASH Electric performed the electrical isolations of all "original" electrical feeds to equipment and systems associated with B865, by taking down specific grids by Lock-Out/Tag-Out and then isolating the main power by cutting, removing, air-gapping, or by re-routing and clearly marking re-routed power for easy identification and future use by ECC and dismantlement operations. This "cold and dark" process greatly reduces the potential for injury and/or death associated with electrical shock during dismantlement of equipment and systems and distribution into walls, ceilings and structures. Re-routed power was provided to the Plenums to enable exhaust system operation during dismantlement operations and maintain a negative air environment inside B865, reducing the potential for a release of contamination outside of the Building.

In addition, GASH Electric provided temporary power stations or "bang-boards" for ECC and dismantlement crews to tie-in temporary power for smaller power distribution units or "turtles". Power cords, hand-tools, light stands, light stringers, and monitoring equipment could be plugged directly into "turtles" for standard 120v operation and providing Ground Fault Circuit Interruption (GFCI) protection to the workers.

D&D Methodology

Extensive characterization in both the High and Low Bays revealed, as anticipated based upon facility operations, higher levels and greater extent of beryllium and radiological contamination in the High Bay. The approach to working D&D from inception of the project was to work from "clean" towards "dirty" or less contaminated to greater contamination areas, minimizing the potential for spread of contamination and cost associated with dismantlement, waste disposition and final clean-up, while reducing worker exposure (ALARA).

For each bay, this was accomplished first by installing hard barriers at entry/exit (from High Bay to Low Bay) man-doors and roll-up doors to separate the bays from one another. These isolations or control points physically separated the High and Low Bay

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and enabled side-by side decontamination, asbestos abatement and general dismantlement activities within separate ventilation and engineering controls dependent upon extent of contamination in either area. This also allowed for asbestos abatement activities to be performed simultaneous in the Low Bay, while decontamination and dismantlement was performed in the High Bay.

Posted Work Areas / Personal Protective Equipment (PPE)

Both the High and Low Bay were initially characterized during pre-bid award as having beryllium contamination and posted as beryllium "controlled areas". Once intrusive work began, as required in the Request for Proposal, the High Bay was upgraded as a beryllium "regulated area", due to the high potential of airborne beryllium in excess of 0.2 micrograms per cubic meter ($\mu g/m^3$). This required workers to be trained as Beryllium Workers and monitored annually for beryllium sensitivity in the RFETS Medical Program. Despite the presence of beryllium, the Low Bay remained posted as a "controlled area" for beryllium throughout the duration of the project with the exception of Room 149, a Heath Physics Vacuum Room (discussed below), which was isolated and posted as a beryllium regulated area. Both the High and Low Bay required workers to wear a minimum of Level B PPE (Tyvek coverall, hood, 2-pairs of booties, 2-pairs of surgeon gloves and taped seams) and an Air Purifying Respirator with HEPA (High Efficiency Particulate Air) cartridges. Additional PPE included as a minimum, safety-toe boots, leather or other types of gloves, hard hat and outer rubber boots once inside either bay.

As mentioned in the introduction, the High Bay contained greater extent of beryllium and radiological contamination due to facility operations. In addition to a beryllium regulated area in the High Bay, the area was also established as a contaminated area (CA) for radiological contamination. Work inside the High Bay was required under radiological guidelines, monitoring requirements, and radiation exposure limits outlined on Radiological Work Permits (RWP's), issued by Radiological Engineering and Radiological Operations.

Asbestos Containing Materials (ACM) Abatement

Asbestos abatement was performed by Onyx Superior, Inc., in accordance with Colorado State Regulation 8 requirements. Both the High and Low Bay contained significant quantities of Asbestos Containing Materials ACM's), which included floor tiles and mastic, thermal system insulation, oakum (concrete wall penetration insulation around ductwork and piping), weather caulking around windows, plaster walls, drywall mud and equipment insulation (e.g., furnace bricks). Glovebag component removal (removing ACM and mechanical equipment e.g., piping with insulation) was used in place of full containments, e.g., vertical pipe-runs containing ACM pipe insulation in the High Bay.

Due to the extent of ACM's in the Low Bay, e.g., floor tile, drywall and mud, and plaster walls with wire lathe, the entire bay was established as a full containment, the internal walls and windows were used as the primary barrier and man doors were established as "pop-up" containments/control points under negative air with plastic tents and established as critical barriers (exit and entry points). Dismantlement and demolition of internal offices/cubicles (drywall and drywall mud) and locker/rest rooms (plaster walls with wire lathe) were performed as part of large scale abatement activities by Onyx Superior. Final

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cleaning and clearances, performed by an Independent Air Monitoring Contractor, were required as part of final decontamination of both High and Low Bay.

Low Bay Dismantlement

As discussed in the previous section, asbestos abatement, including the demolition of non-load bearing walls, e.g., internal office walls, hallways, locker/rest room walls and ceilings, were performed in parallel. The abatement and internal wall demolition provided larger, open work areas for dismantlement crews to access HVAC Systems, the overhead crane and rails, sprinkler piping, electrical conduit, lighting, and mechanical room equipment- transformers, heat exchanger, hot water heaters, piping and conduit.

Mechanical equipment was dismantled and segregated of Resource Conservation and Recovery Act (RCRA) components (lead, circuit boards, and mercury switches), drained of liquids (water, oil) to meet waste packaging requirements, size-reduced and loaded into sea/land cargo containers as Low Level Waste (LLW). LLW contaminated ACM was loaded into cargoes. The housing was sealed and maintained under the building negative air to eliminate the potential for a contamination release outside of the containment and into the environment. Additionally, RCRA and TSCA waste were removed from equipment and building systems and packaged in drums or crates.

Both the Low Bay and the High Bay exhaust ductwork systems (room exhaust and/or point source for equipment exhaust), was removed while the Building Plenums were running/active. This provided a "pull or sucking" of air into the exhaust system (pulling potential contaminants) away from workers while cutting, separating (via flanges) and dismantling the exhaust duct in-place. Additional engineering controls included pre-dismantlement coupon sampling (cutting small holes and sampling) in designated sections, elbows and low velocity areas, to determine the extent of contamination (either beryllium and/or radiological) prior to dismantlement under RWP guidelines and direction of a full-time Radiological Control Technician (RCT). Dismantlement crews worked from branches furthest away from the Plenum Filters or "upstream" towards the Plenums, while the system was operating, to minimize the potential for contamination spread and worker exposure.

Other engineering controls included spraying sections of duct or equipment with a contamination control fixative (C.C. Fix) on the external horizontal surfaces and/or internal surfaces (where accessible) to reduce the potential for a contamination release. Sections of duct or equipment were sized to manageable sections and then lowered to the ground with duct hoists, mechanical lifts or approved hoist and rigging plans and packaged as LLW.

Health Physics Vacuum Room (Room 149)

Due to high levels of beryllium contamination inside the health physics vacuum unit and hoppers, the room walls, door and ceiling were left in-place to provide a "housing" to protect workers from potential exposure, and the equipment from potential damage during other dismantlement activities, primarily dismantlement activities in the adjacent mechanical room.

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Removing the Health Physics Vacuum, associated hoppers (3 each) and room was a six-step process. The first step included an initial spraying of C.C. Fixative to encapsulate the entire internal walls, floor and ceiling and external surface area of the vacuum power unit, compressor and hoppers. This provided an initial barrier and significantly reduced the potential for airborne contamination release during the next four steps.

After allowing the C.C. Fix to cure over 48 hours, the second step included wrapping each piece of equipment and hopper with poly shrink-wrap sheeting. The sheeting was wrapped and sealed with tape to provide a second barrier against a potential airborne release of contaminants from inside the equipment during step three. The third step entailed removing the equipment from its tie-in points to vacuum intake and exhaust lines. This was accomplished by pre-drilling at separation points under point source ventilation with portable HEPA vacuums. This provided a location to spray foam into the exhaust or intake lines and seal potential internal contamination.

After allowing recommended cure time for the foam, dismantlement crews cut through the exhaust and intake lines at the foamed locations. After each cut was completed the stubbed ends were wrapped with plastic and taped to reduce workers exposure to potential contamination during equipment removal in step five.

The forth-step included building a full containment around the exterior of the entire Health Physics Vacuum Room. This enabled work crews to demolish the gypsum walls and ceiling inside a full-beryllium regulated containment. Wall and ceiling debris was bagged inside the containment. Each bag was wiped clean or decontaminated prior to removal. The use of a full containment eliminated the potential for spreading beryllium into other areas of the Low Bay, maintained as a beryllium controlled area.

The fifth-step was performed once the room was completely demolished, this provided easier access to the vacuum power unit and compressor and each of the hoppers for rigging and removal out of the containment in preparation for waste load-out. Each piece of equipment was removed under an approved hoist and rigging plan, rigged to the Low Bay structural ceiling twin-tee beams, and lowered and drifted from a vertical to a horizontal position onto hand carts in preparation for removal from the containment for waste packaging. Each piece of equipment was wiped clean and decontaminated on the exterior surface of the shrink-wrap and removed out of the containment for final disposition as LLW.

The sixth and final step included a gross-decontamination of the area inside the full containment, which was then sampled, surveyed, and down-posted from a beryllium regulated area to a controlled area. The containment was then removed and packaged as waste.

High Bay Dismantlement

As previously discussed, the High Bay contained the majority of beryllium and radiological contamination, especially on and in processing equipment (presses, furnaces, Hydrospin, Drop Hammer, etc.) and systems (HVAC, electrical-transformers, bay lights, etc), which supported building operations. The initial engineering control implemented prior to removing each system and equipment was relatively the same. By initially spraying C.C. Fixative to "fix" potential removable contamination prior to dismantlement

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provided an additional level of protection to minimize worker exposures and spread of contamination. Spraying C.C. Fixative was an on-going process, from initial mobilization, which included a large-scale fogging of the entire High Bay, and smaller hand-spraying applications, to wipe-decontamination of surfaces for a majority of dismantlement activities.

A contaminated portion of Building 865 exterior wall, consisting of the asbestos "blast panels", was removed before demolition of the facility. The area surrounding this portion of wall had a containment structure constructed of plywood and two layers of plastic. All of the blast panels were removed and brought into the building for appropriate disposition. Once the abatement was complete the inner layer of plastic was removed leaving the outer containment structure, which was maintained until building demolition.

Process and "Heavy" Equipment Dismantlement, Removal and Waste Packaging

Each piece of equipment (e.g., furnaces, presses, mills, hydro-spin, scales, cranes, etc.) presented unique challenges. Due to the age of some of the equipment, and turn-over of multiple organizations through production years, original operating and maintenance manuals were not available. Some manufacturers went out of business shortly after production of specialized equipment specifically designed for the DOE and DOD during the Cold War. Therefore, dismantlement of these pieces of equipment generally progressed in a reverse order of original equipment production and configuration. A majority of the equipment was removed from a top, down approach. This included removing ancillary components, e.g., motors, water cooling lines, hydraulic hoses and reservoirs, pumps, control modules, reducing the overall size and weight of the equipment for ease of rigging, handling, packaging, and shipment.

It should be noted that any equipment and systems containing residual liquids, e.g., water lines, hydraulic fluid lines, process waste lines and/or applied non-cured C.C. Fixative, required draining or curing time prior to packaging as LLW to meet the guidelines in the Waste Generating Instructions (WGI) and requirements of the Waste Acceptance Criteria (WAC) for the Waste Receiving Facility.

Equipment that could be size-reduced in-place, and then moved on its manufactured wheels/rollers or placed on manufactured rollers (multi-tons), was packaged directly into LLW cargo containers. This opened the floor space for multiple work crews to perform other dismantlement activities in the overhead area, e.g., HVAC removal, bay lighting, hangers, domestic water, gas lines, health physics vacuum, house vacuum, process water, process waste, and cooling tower water lines. A majority of equipment and systems required isolation or air-gapping, from original configuration tie-in points, e.g., exhaust ventilation, power supply, compressed gas and/or process water and waste lines. Engineering controls were used in agreement between Radiological Operations and/or Industrial Hygiene and Safety (IH&S). Dismantlement engineering controls varied from point source ventilation tied into Building exhaust ventilation or HEPA vacuums, spraying C.C. Fixative and/or using foam and cut methods. Often several of these controls would be implemented at the same time.

Larger "heavy" pieces of process equipment, weighing between 50,000 lbs to 300,000 lbs were either dismantled in-place, e.g., the Cincinnati Hydrospin, Cincinnati Rolling-Press, and Lowey Mill, or removed using a specialized four-point 500-ton hydraulic gantry

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system. The system used four hydraulic lifting pistons, two lifting I-beams on a track/rail system, which would lift and remove equipment (two Iso-Frame Presses, one Hydraulic Ram, one Drop Hammer and one Extrusion Press) and relocate on rails to a staging area for removal from the building. The Hydraulic Ram, Drop Hammer and Extrusion Press each sat on pedestals inside pits from a depth of 5-feet below slab grade to approximately 20-feet (Erie Drop Hammer) below slab grade. The specialized gantry system picked the Hydraulic Ram and Drop Hammer out of pits in a vertical position and rotated them to a horizontal position, placed each on multi-ton rollers in preparation for removal from the High Bay. Each piece of equipment was then re-sprayed with C.C. Fixative, wrapped with shrink-wrap poly sheeting, and pulled out of the High Bay on multi-ton rollers. Each piece of equipment, when removed from the High Bay to the exterior of B865, depending on size, was lifted by forklift or crane and loaded onto shipping platforms/skids. The platforms were prepared as an approved LLW shipping package, canvassed and chained and sprayed with InstaCote© (sprayed on micro-filament poly adhesion coating) for shipping.

Beryllium Wash Room

The High Bay also housed a steel two-story structure, Room 101A-lower room and Room 101B-upper room for performing acid washes of processed beryllium during Facility Operations. Associated with the structure was a Scrubber System (on the exterior of B865) which was tied into the exhaust ventilation system from Room 101B.

During Facility Operations, the Scrubber System would spray sodium hydroxide (NaOH) inside the Scrubber to neutralize any acid vapors inside the exhaust system from the Beryllium Wash Room. This would neutralize vapors prior to exhausting the air through the B867 multi-staged HEPA filter Plenum System (downstream), and then finally dumping the filtered "clean" air out into the environment.

The removal of the Scrubber System entailed several glovebag/sleeving applications on the separation points (flanged connections), while the system was maintained under negative ventilation. The Scrubber System was removed while connected to the Building Plenum System, working from the upstream side of the Plenums. Picking the pieces of 18-inch exhaust duct, fans and scrubber were accomplished using approved rigging plans and the KH Construction Crane and Crew. Each section was documented as not containing residual liquids and packaged as LLW.

The Beryllium Wash Room (Room 101A and B) was stripped of all ancillary equipment and components, e.g., platform, railing, doors, duct work, piping, process waste lines, hangers, conduit and uni-strut, to reduce the total weight of the structure. The removal of the entire steel structure was planned by KH Engineering, which entailed jacking the structure onto I-beams positioned on multi-tons. The structure was then pulled with a forklift and staged under the High Bay 20,000 lb capacity Bridge Crane. The Engineering Plan detailed cut locations for rigging points, and the sequencing for cutting, separation and removal of the upper room (101B) from the lower room (101A). The rooms were separated and positioned on shipping platforms, sprayed with C.C. Fixative, wrapped with shrink-wrap, transferred out of the High Bay, loaded on shipping skids with InstaCote© (process previously discussed) and prepared for shipping without having to further size reduce, maximizing waste shipments, minimizing cost and risk associated with dismantling.

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III. Verification Action Goals Were Met

Four action objectives were established for Building 865 Cluster Removal Project prior to beginning the demolition:

- ***Decontamination of the facilities (as necessary) to support release for decommissioning per site approved procedures.***

  The facilities primary structures were decontaminated to free-release standards and placed in the off-site landfill. The high bay walls were sprayed with Fire Damp Fixative in order to meet the beryllium free-release criteria. InstaCote© was applied to the floor in Building 865 high bay to fix contamination and disposed of as LLW in accordance with regulatory agreement and the consultation process with the LRA.

- ***Decommissioning the Building 865 Cluster facilities in accordance with RFCA and applicable or relevant and appropriate requirements.***

  RFCA and other relevant requirements were complied with throughout the project. Consultations with the LRA were conducted when any concerns or suggestions regarding the implementation of RFCA were identified.

- ***Complete decontamination and decommissioning activities in a manner that is protective of site workers, the public and the environment.***

  Decontamination and decommissioning activities were completed within regulatory requirements. Continuous air sampling for beryllium and asbestos was implemented during demolition and waste loading activities. Rooms were sealed and fixatives applied during manual decontamination. Construction of a tent around the entrance to the west plenum in Building 868 was installed prior to dismantlement. Dust control measures were implemented during the building demolition. These measures included utilizing wet methods, via fire hydrant and hoses, to control dust during demolition.

- ***Demolish the 865 Cluster facilities structures, utilities and process lines to 3' below grade.***

  All concrete from the Building 865 Cluster was removed except for the concrete slab, pits and sump under the Building 865 super structure. The process waste lines, concrete slab, pits, sanitary and utility lines, were turned over to Environmental Restoration (ER) for remediation. Process drain lines were suspected of containing radiological contamination, therefore the lines were grouted or foamed and left for ER to remove with the slab.

IV. Verification of Treatment Process

This section is not applicable to this project.

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V. Radiological Analysis

The Environmental Survey and Site Assessment Program (ESSAP) of Oak Ridge Institute for Science and Education (ORISE) performed independent verification (IV) PDS of Building 865. Survey activities were performed by ESSAP between July 21-24, 2003, and consisted of alpha plus beta surface scans, direct measurements for both alpha and beta total activity, and collection of sample media consisting of smears, concrete, and insulation materials.

Data collected by ESSAP for the low bay indicated that the guidelines for unrestricted release have been met with the exception of the drain line that remained in the floor.

Based on data available during the survey, the ESSAP results did not support the conclusion that the high bay met the criteria for unrestricted release. For the areas that did not meet the unrestricted release, K-H performed additional decontamination and surveys. After this additional decontamination effort, these areas met the unrestricted release criteria.

See Appendix 3 of this document containing the following Pre-Demolition Survey Reports (PDSR):

- Building 865 Low Bay – PDSR for the Building 865 Low Bay, Revision 0, dated April 15, 2003, CDPHE concurrence letter dated July 8, 2003 (Appendix 3, Article 1)
- Building 865 High Bay – PDSR for the Building 865 High Bay, Revision 0, dated August 12, 2003, CDPHE concurrence letter dated August 22, 2003 (Appendix 3, Article 2)
- Building 866 – PDSR for the Building 866 Closure Project, Revision 0, dated September 23, 2003, CDPHE concurrence letter dated October 9, 2003 (Appendix 3, Article 3)
- Building 867 – PDSR for the Building 867 Plenum Fan Room Closure Project, Revision 0, dated August 14, 2003, CDPHE concurrence letter dated August 26, 2003 (Appendix 3, Article 4)
- Building 868, PDSR for the Building 868, Revision 0, dated July 23, 2003, CDPHE concurrence letter dated August 8, 2003 (Appendix 3, Article 5).

VI. Demolition Survey Results

The Air Quality Management (AQM) program conducted project monitoring for beryllium (PM-Be) during B-865 demolition in accordance with the Rocky Flats Cleanup Agreement *Integrated Monitoring Plan* (IMP). The IMP prescribes that a 6-sampler network surround the potential source area (in this case, B-865) and operate during demolition and rubble handling operations. Samples were collected on 47 millimeter (mm) cellulose filter paper and were shipped off-Site for analysis. Total beryllium mass was determined by Grand Junction Analytical Laboratory using inductively-coupled plasma/atomic emission spectroscopy, and sample concentrations (micrograms per cubic meter air [g/m^3]) were then calculated based on sampler flow rate. These concentrations were compared to action levels defined in the IMP. The most stringent IMP action level for beryllium in ambient air is 0.01 g/m^3, and corresponds with the National Emission

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Standard for Hazardous Air Pollutants for Beryllium (40CFR61.32). Results were well below this action level.

Samples were exchanged daily during building demolition. Multi-day samples were collected during rubble load-out operations, since projects emissions during demolition had been demonstrated to be well below the action level. Some results that were greater than the pre-demolition baseline concentration were observed, but nothing approaching the action level.. These results confirm that project controls were effective in minimizing the migration of beryllium contamination from B-865 demolition.

Sampler locations are documented by the map file "865 PM-Be sampling map.pdf." Table 1, below, contains the detailed PM-Be monitoring data.

Table 1. Detailed Sampling Results

Date Sampled	Field ID	RIN No.	Elapsed Time (hr)	Final Flow (cfm)	Sample Volume (m3)	Be Result (ug/filter)	Beryllium (ug/m3)
7/21/03	865B1-1	03D2041-001	9.0	6.0	91.75	0.012	1.308E-04
	865B2-2	03D2041-002	9.0	6.2	94.80	0.013	1.371E-04
	865B3-3	03D2041-003	9.0	6.2	94.80	0.011	1.160E-04
	865B4-4	03D2041-004	8.8	5.8	86.72	0.013	1.499E-04
	865B5-5	03D2041-005	8.9	6.0	90.73	0.012	1.323E-04
	865B6-6	03D2041-006	8.9	6.4	96.78	0.012	1.240E-04
7/22/03	865B1-7	03D2042-001	8.3	6.0	84.61	0.011	1.300E-04
	865B2-8	03D2042-002	8.3	6.2	87.43	0.010	1.144E-04
	865B3-9	03D2042-003	8.3	6.2	87.43	0.009	1.029E-04
	865B4-10	03D2042-004	8.3	5.6	78.97	0.012	1.520E-04
	865B5-11	03D2042-005	8.3	6.2	87.43	0.010	1.144E-04
	865B6-12	03D2042-006	8.4	6.5	92.77	0.010	1.078E-04
7/23/03	865B1-13	03D2043-001	9.7	5.5	90.64	0.013	1.434E-04
	865B2-14	03D2043-002	9.0	6.2	94.80	0.012	1.266E-04
	865B3-15	03D2043-003	9.7	5.8	95.59	0.012	1.255E-04
	865B4-16	03D2043-004	9.7	6.0	98.88	0.013	1.315E-04
	865B5-17	03D2043-005	9.6	5.7	92.97	0.011	1.183E-04
	865B6-18	03D2043-006	9.6	6.5	106.02	0.014	1.321E-04
7/24/03	865B1-19	03D2044-001	9.0	5.8	88.69	0.012	1.353E-04
	865B2-20	03D2044-002	9.0	6.3	96.33	0.011	1.142E-04
	865B3-21	03D2044-003	9.0	6.0	91.75	0.010	1.090E-04
	865B4-22	03D2044-004	8.9	5.7	86.19	0.011	1.276E-04
	865B5-23	03D2044-005	8.9	6.0	90.73	0.012	1.323E-04
	865B6-24	03D2044-006	8.4	6.5	92.77	0.011	1.186E-04
7/25/03	865B1-25	03D2045-001	7.5	6.2	79.00	0.012	1.519E-04
	865B2-26	03D2045-002	7.4	6.5	81.72	0.010	1.224E-04
	865B3-27	03D2045-003	7.4	6.4	80.47	0.010	1.243E-04
	865B4-28	03D2045-004	7.5	6.5	82.83	0.011	1.328E-04
	865B5-29	03D2045-005	7.5	6.2	79.00	0.009	1.139E-04
	865B6-30	03D2045-006	7.2	6.6	80.74	0.010	1.239E-04
8/13/03	865B1-31	03D2046-001	9.3	5.8	91.64	0.004	4.365E-05
	865B2-32	03D2046-002	9.3	6.0	94.80	0.004	4.219E-05
	865B3-33	03D2046-003	9.3	5.3	83.74	0.006	7.165E-05
	865B4-34	03D2046-004	9.3	6.2	97.96	0.006	6.125E-05
	865B5-35	03D2046-005	9.4	5.6	89.44	0.004	4.472E-05
	865B6-36	03D2046-006	9.3	6.0	94.80	0.003	3.164E-05

Table 1, continued.

Date Sampled	Field ID	RIN No.	Elapsed Time (hr)	Final Flow (cfm)	Sample Volume (m3)	Be Result (ug/filter)	Beryllium (ug/m3)
8/14/03	865B1-37	03D2047-001	10.0	5.8	98.54	0.008	8.118E-05
	865B2-38	03D2047-002	7.0	6.4	76.12	0.005	6.569E-05
	865B3-39	03D2047-003	10.0	6.0	101.94	0.01	9.810E-05
	865B4-40	03D2047-004	7.0	5.5	65.41	0.011	1.682E-04
	865B5-41	03D2047-005	7.0	6.5	77.30	0.006	7.761E-05
	865B6-42	03D2047-006	7.2	6.0	73.40	0.004	5.450E-05
8/15/03	865B1-43	03D2048-001	9.9	6.4	107.65	0.008	7.432E-05
	865B2-44	03D2048-002	9.9	5.8	97.56	0.012	1.230E-04
	865B3-45	03D2048-003	9.9	5.2	87.47	0.013	1.486E-04
	865B4-46	03D2048-004	9.9	5.8	97.56	0.008	8.200E-05
	865B5-47	03D2048-005	9.9	6.0	100.92	0.009	8.918E-05
	865B6-48	03D2048-006	10.0	5.5	93.45	0.009	9.631E-05
8/18/03	865B1-49	03D2049-001	8.5	6.4	92.43	0.007	7.574E-05
	865B2-50	03D2049-002	8.3	6.0	84.61	0.008	9.455E-05
	865B3-51	03D2049-003	8.4	6.0	85.63	0.009	1.051E-04
	865B4-52	03D2049-004	8.3	6.3	88.84	0.008	9.005E-05
	865B5-53	03D2049-005	8.4	6.0	85.63	0.005	5.839E-05
	865B6-54	03D2049-006	8.3	5.7	80.38	0.008	9.953E-05
8/19/03	865B1-55	03D2050-001	8.7	6.3	93.12	0.01	1.074E-04
	865B2-56	03D2050-002	8.4	6.0	85.63	0.009	1.051E-04
	865B3-57	03D2050-003	8.7	6.1	90.17	0.009	9.982E-05
	865B4-58	03D2050-004	8.9	6.2	93.75	0.007	7.467E-05
	865B5-59	03D2050-005	8.7	5.9	87.21	0.008	9.173E-05
	865B6-60	03D2050-006	8.7	5.7	84.25	0.01	1.187E-04
8/20/03	865B1-61	03D2051-001	9.4	5.5	87.84	0.01	1.138E-04
	865B2-62	03D2051-002	9.4	5.8	92.63	0.011	1.188E-04
	865B3-63	03D2051-003	9.3	5.3	83.74	0.01	1.194E-04
	865B4-64	03D2051-004	9.4	5.5	87.84	0.009	1.025E-04
	865B5-65	03D2051-005	9.4	5.5	87.84	0.009	1.025E-04
	865B6-66	03D2051-006	9.4	5.2	83.05	0.009	1.084E-04
8/21/03	865B1-67	03D2052-001	9.4	5.5	87.84	0.01	1.138E-04
	865B2-68	03D2052-002	9.4	6.0	95.82	0.007	7.305E-05
	865B3-69	03D2052-003	9.4	5.8	92.63	0.008	8.637E-05
	865B4-70	03D2052-004	9.5	5.0	80.70	0.026	3.222E-04
	865B5-71	03D2052-005	9.4	6.0	95.82	0.005	5.218E-05
	865B6-72	03D2052-006	9.3	5.5	86.90	0.008	9.206E-05

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Table 1, continued.

Date Sampled	Field ID	RIN No.	Elapsed Time (hr)	Final Flow (cfm)	Sample Volume (m3)	Be Result (ug/filter)	Beryllium (ug/m3)
8/22/03	865B1-73	03D2053-001	9.4	6.0	95.82	0.013	1.357E-04
	865B2-74	03D2053-002	9.4	5.8	92.63	0.003	3.239E-05
	865B3-75	03D2053-003	9.4	5.8	92.63	0.012	1.295E-04
	865B4-76	03D2053-004	9.4	5.2	83.05	0.027	3.251E-04
	865B5-77	03D2053-005	9.4	5.8	92.63	0.003	3.239E-05
	865B6-78	03D2053-006	9.4	5.5	87.84	0.008	9.108E-05
8/25/03	865B1-79	03D2054-001	9.5	6.0	96.84	0.009	9.293E-05
	865B2-80	03D2054-002	9.5	5.9	95.23	0.005	5.250E-05
	865B3-81	03D2054-003	9.5	6.0	96.84	0.003	3.098E-05
	865B4-82	03D2054-004	9.5	5.9	95.23	0.004	4.200E-05
	865B5-83	03D2054-005	9.5	6.1	98.46	0.004	4.063E-05
	865B6-84	03D2054-006	9.5	5.5	88.77	0.006	6.759E-05
8/26/03	865B1-85	03D2055-001	9.5	5.6	90.39	0.012	1.328E-04
	865B2-86	03D2055-002	9.4	5.7	91.03	0.007	7.690E-05
	865B3-87	03D2055-003	9.4	5.9	94.23	0.007	7.429E-05
	865B4-88	03D2055-004	9.5	5.9	95.23	0.007	7.351E-05
	865B5-89	03D2055-005	9.4	5.8	92.63	0.005	5.398E-05
	865B6-90	03D2055-006	9.4	5.9	94.23	0.005	5.306E-05
8/27/03	865B1-91	03D2056-001	9.7	5.6	92.29	0.006	6.501E-05
	865B2-92	03D2056-002	9.7	5.5	90.64	0.003	3.310E-05
	865B3-93	03D2056-003	9.7	5.8	95.59	0.006	6.277E-05
	865B4-94	03D2056-004	9.7	5.5	90.64	0.003	3.310E-05
	865B5-95	03D2056-005	9.7	6.0	98.88	0.003	3.034E-05
	865B6-96	03D2056-006	9.7	5.5	90.64	0.003	3.310E-05
8/28/03	865B1-97	03D2057-001	9.3	5.9	93.22	0.003	3.218E-05
	865B2-98	03D2057-001	9.3	5.5	86.90	0.005	5.753E-05
	865B3-99	03D2057-001	9.3	5.8	91.64	0.003	3.274E-05
	865B4-100	03D2057-001	9.3	5.8	91.64	0.003	3.274E-05
	865B5-101	03D2057-001	9.3	5.6	88.48	0.003	3.390E-05
	865B6-102	03D2057-001	9.2	5.5	85.97	0.003	3.490E-05
9/2/03	865B1-103	03D2058-001	9.5	6.0	96.84	0.012	1.239E-04
	865B2-104	03D2058-001	9.5	6.0	96.84	0.007	7.228E-05
	865B3-105	03D2058-001	9.5	5.7	92.00	0.008	8.696E-05
	865B4-106	03D2058-001	9.5	6.0	96.84	0.006	6.196E-05
	865B5-107	03D2058-001	9.5	5.9	95.23	0.008	8.401E-05
	865B6-108	03D2058-001	9.5	5.5	88.77	0.007	7.885E-05

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Table 1, continued.

Date Sampled	Field ID	RIN No.	Elapsed Time (hr)	Final Flow (cfm)	Sample Volume (m3)	Be Result (ug/filter)	Beryllium (ug/m3)
9/3-9/5/03	865B1-109	03D2059-001	28.5	5.3	256.64	0.02	7.793E-05
	865B2-110	03D2059-001	28.4	5.2	250.91	0.013	5.181E-05
	865B3-111	03D2059-001	28.4	5.2	250.91	0.02	7.971E-05
	865B4-112	03D2059-001	28.4	5.0	241.26	0.014	5.803E-05
	865B5-113	03D2059-001	28.4	5.2	250.91	0.009	3.587E-05
	865B6-114	03D2059-001	28.8	4.9	239.76	0.01	4.171E-05
9/8-9/9	865B1-115	03D2060-001	19.6	5.0	166.50	0.016	9.609E-05
	865B2-116	03D2060-001	19.6	5.2	173.16	0.015	8.662E-05
	865B3-117	03D2060-001	19.6	5.0	166.50	0.026	1.562E-04
	865B4-118	03D2060-001	19.5	5.5	182.22	0.004	2.195E-05
	865B5-119	03D2060-001	19.6	5.7	189.81	0.003	1.580E-05
	865B6-120	03D2060-001	19.8	5.2	174.93	0.004	2.287E-05
9/10-9/12	865B1-121	03D2118-001	29.5	5.3	265.64	0.053	1.995E-04
	865B2-122	03D2118-001	29.4	5.7	284.72	0.041	1.440E-04
	865B3-123	03D2118-001	29.5	5.7	285.69	0.13	4.550E-04
	865B4-124	03D2118-001	28.9	5.4	265.15	0.044	1.659E-04
	865B5-125	03D2118-001	29.4	4.9	244.76	0.035	1.430E-04
	865B6-126	03D2118-001	32.4	5.2	286.25	0.23	8.035E-04
9/15-9/16	865B1-127	03D2119-001	19.6	5.2	173.16	0.014	8.085E-05
	865B2-128	03D2119-001	19.6	5.5	183.15	0.009	4.914E-05
	865B3-129	03D2119-001	19.6	5.2	173.16	0.012	6.930E-05
	865B4-130	03D2119-001	19.6	5.5	183.15	0.013	7.098E-05
	865B5-131	03D2119-001	19.6	5	166.50	0.013	7.808E-05
	865B6-132	03D2119-001	19.6	5.2	173.16	0.005	2.887E-05
9/17-9/18	865B1-133	03D2120-001	17.6	5.8	173.44	0.021	1.211E-04
	865B2-134	03D2120-001	16.9	5.8	166.54	0.004	2.402E-05
	865B3-135	03D2120-001	17.5	5.7	169.48	0.004	2.360E-05
	865B4-136	03D2120-001	17.5	5.4	160.56	0.011	6.851E-05
	865B5-137	03D2120-001	17.5	5.7	169.48	0.011	6.491E-05
	865B6-138	03D2120-001	17.5	5.4	160.56	0.6	3.737E-03

Notes:

- Sampler map available in Acrobat document "perf_monitoring-rad-net.pdf"

Summary of Airborne radioactivity Sampling for 865 Complex Demolition

Building was demolished in August, 2003. This occurred after decontamination and application of fixative to all interior surfaces. Perimeter airborne sample pumps were deployed at the boundary fence surrounding B867 within about 50 feet of the structure throughout the entire demolition activity of about 3 days. All samples were <2% of the Derived Air Concentration (DAC) for Depleted Uranium.

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Removable contamination surveys taken daily as demolition work progressed in B867, B866 and B865 did not show the presence of any removable contamination above unrestricted release limits as governed by the DOE Radiological Control Manual, Table 2-2, and Site radiological control procedures.

Ambient Monitoring for Beryllium

The ambient air around the Building 865 Demolition Project was monitored for beryllium that conceivably might have been resuspended from unknown residual contamination. The monitoring was performed at six locations around the demolition activities for all periods during which there was work taking place, as well as the week before and after the project period. Locations are depicted in Figure 1.

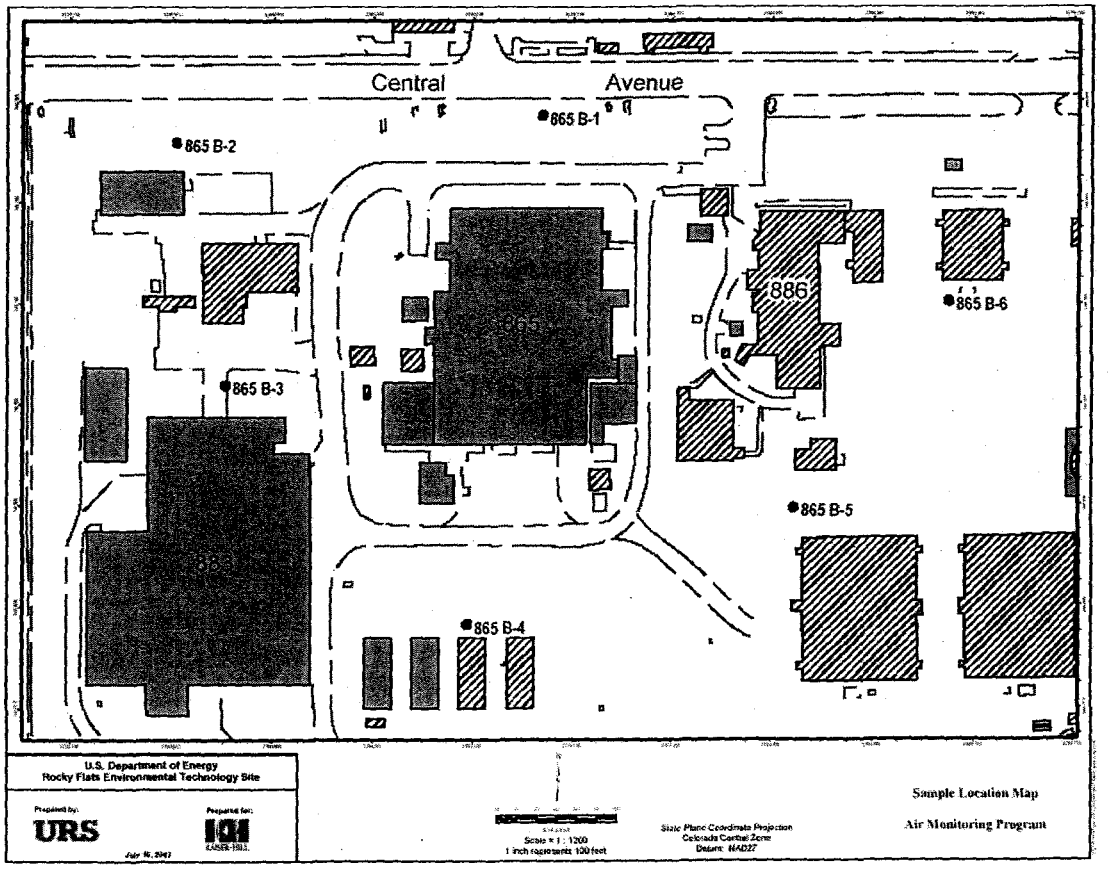

Figure 1 - Monitoring Locations

Action levels were assigned to the activity. The most stringent and the one that is addressed here was based on the ambient NESHAP standard for beryllium (0.01 ug/m3 30-day average) even though that regulatory standard was not directly applicable to this activity. This first action level was applied to daily measurements, without averaging, and was hence quite conservative. The action level was not exceeded in any

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measurement at any monitoring location during the project. The results are shown in Figure 2, below.

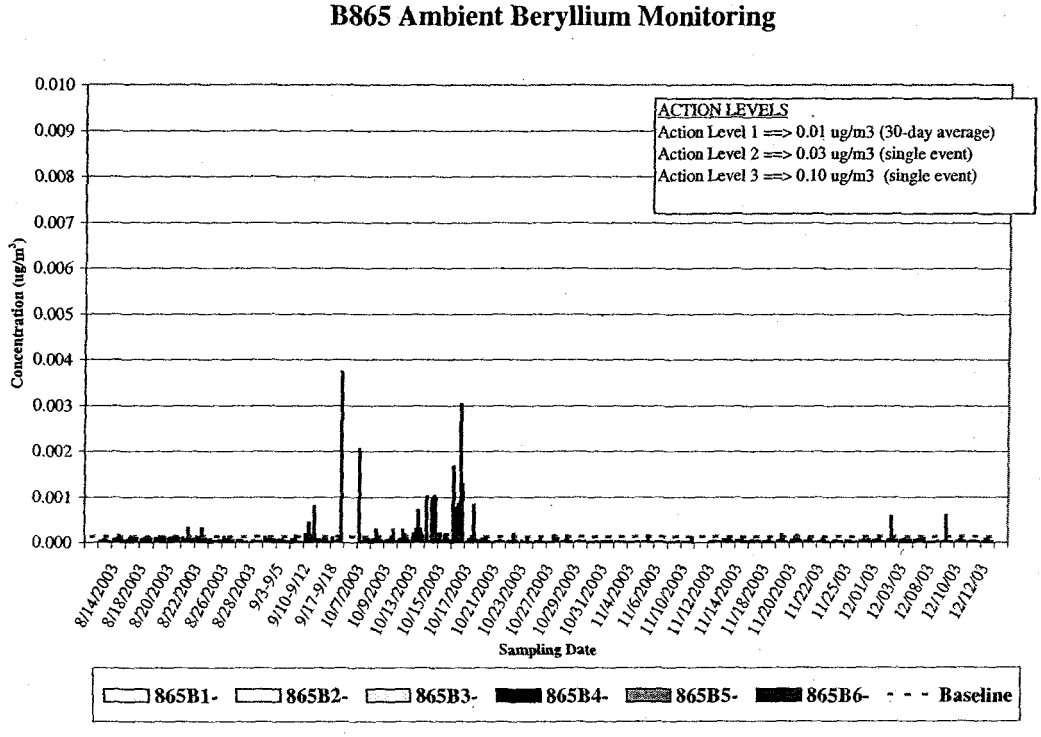

Figure 2 – Results compared to prescribed action levels

VII. Waste Stream Disposition

Building 865 Closure Project generated the following waste types including sanitary, hazardous, TSCA, asbestos, low-level, low-level mixed, low-level TSCA, and recycled materials. Listed below is the quantity and disposal site for these waste types and materials:

1. Sanitary Disposal	
Disposal Site:	Front Range Landfill, Erie, Colorado
Waste Volume (m3):	9800
Waste Weight (tons):	5062.4
Additional Information:	This waste included building structural material that met the free-release criteria from Buildings 865, 867, 863, and valve vaults 5 and 6.
2. Hazardous Disposal	
Disposal Site:	On site RFCA units

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Waste Volume (m3):	.21
Waste Weight (tons):	Unknown
Additional Information:	This waste consisted of mercury switches, nickel-cadmium batteries, and other minor quantities of hazardous waste.
3. TSCA Waste Disposal	
Disposal Site:	Onyx Special Services, Inc. Phoenix, AZ and Onyx Environmental Services, Port Arthur, TX.
Waste Volume (m3):	2.3
Waste Weight (tons):	Unknown
Additional Information:	This waste consisted of large liquid filled capacitors and PCB contaminated oil.
4. Asbestos Waste Disposal	
Disposal Site:	
Waste Volume (m3):	
Waste Weight (tons):	
Additional Information:	See low-level and low-level mixed waste sections
5. Low Level Waste Disposal	
Disposal Site:	Nevada Test Site, NV
Waste Volume (m3):	4739
Waste Weight (tons):	Unknown
Additional Information:	This waste included machinery, building structures, piping, ductwork, and some minor amounts of low-level friable asbestos.
6. Low Level Waste Disposal	
Disposal Site:	DSSI, Kingston TN
Waste Volume (m3):	3.98
Waste Weight (tons):	Unknown
Additional Information:	This waste included low-level oils drained from equipment.
7. LLM Waste Disposal	
Disposal Site:	Envirocare of Utah, Inc., Salt Lake City, UT
Waste Volume (m3):	82.75
Waste Weight (tons):	Unknown
Additional Information:	This waste includes crushed light bulbs, lead piping, circuit boards, metal fines, lead lined equipment and 3 RCRA interim status tanks and ancillary equipment. Also included is minor amounts of friable asbestos.
8. Recycled Material	
Disposal Site:	Exide Technologies, Reading PA
Waste Volume (m3):	1

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Waste Weight (tons):	Unknown
Additional Information:	Lead acid batteries for recycle.
9. Property Disposition	
Disposal Site:	PU&D for resale
Waste Volume (m3):	1
Waste Weight (tons):	.5
Additional Information:	This waste included the motors from the filter plenums, the electrical equipment from B863, and minor quantities of circuit boards from outside areas.

VIII. Deviations From the Decision Document

The RFCA RSOP for Facility Disposition states a facility will be decontaminated to meet the free release criteria for beryllium. The B865 high bay wall was coated with Fire Dam fixative to meet the free release criteria. Additionally, no removable contamination from beryllium or depleted uranium was detected from areas of the Building 865 slab where the InstaCote™ was torn and removed. As a result, exposed areas of the slab were not re-fixed with CC Fix to meet free-release criteria. Regulatory Contact Record for Building 866 Demolition/865 Slab is included in Appendix 2, Article 5.

The Closure Summary Report for interim status RCRA Units 40.17, 40.18, and 40.19 in Buildings 865 and 866 is included in Appendix 4, Article 1. The report is included pursuant to the RFETS "Closure Plan for Interim Status Units at RFETS," Rev.2/15/2000, the RFETS RFCA RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities, Notification Letter, February 12, 2001 (02-DOE-00217). The report contains a description of major closure activities and any deviations from those stated in the RSOP Notification Letter and other relevant information.

IX. Description of Site Condition at End of Decommissioning

All above ground buildings and other structures, concrete pads (other than B865 Slab), overhead steam lines, condensate lines, air lines, alarm lines, and electrical lines along the supporting stanchions and power poles were removed.

All other piping and drain fields for buildings other than 865 and outside of the 865 footprint were removed to a minimum of 3 feet below grade. Those underground sewer lines, drain fields, electrical lines, phone lines/fiber-optic cables, below 3 feet and not contaminated, were left in place. The underground lines left in place are as follows:

- 4-inch Sanitary sewer line from the northeast corner of Building 865 low bay to Manhole MH-178 was flushed, disconnected and capped. This section of piping was left in place. Approximately 6' deep.

- 6-inch Fire Water line east of Building 865 high bay and east of T865I was cut and capped. The remaining section of pipe was left in place. Approximately 6' deep.

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- 3" Domestic Water line west of Building 865 high bay and near the southwest corner of Building 866 was cut and capped 7' below grade. The remaining line west of Building 866 to Central Ave was left in place.

- Natural Gas line from the northwest corner of Building 865 low bay to Central Ave was purged, capped and left in place. Approximately 3' deep.

- Steam/Condensate line southeast corner of Building 865 low bay was air gapped. The remaining steam line, supports and structures were removed between Building 865 to Central Ave.

- Electrical line (conduit) from the power station located south of Building 863 and to the southeast corner of Building 865 high bay was stripped of wires and the conduit left in place. Approximately 4' deep.

- Power Instrumentation Alarm line wiring between the alarm station west of Building 866 and west of Building 865 high bay was removed and the conduit left in place (approximately 2' deep). UC-1 Alarm lines entering Building 865 at the southwest corner of the high bay, southeast corner of building 867, was stripped of wiring and the conduit left in place (approximately 2' deep). CAPASU line entering Building 865 low bay from the steam line east of the building was disconnected and removed with the steam line. Telephone and alarm lines located northwest of Building 865 low bay were cut, stripped of wiring, and the conduit left in place. Approximately 2' deep.

Above information on locations of the lines is approximate.

X. Demarcation of Excavation

This section is not applicable.

XI. Demarcation of Wastes Left in Place

All waste materials were removed.

XII. Dates and Duration of Specific Activities

Beginning in March 2000 and continuing through January 2001, loose property removal, and some equipment dismantlement, decontamination, and residual fluid draining was accomplished by K-H RISS. In January 2002, Environmental Chemical Corp. was awarded contract by K-H to D&D Building 865 Cluster. Starting in September 2002, a transition in project management occurred for the D&D of Building 865 Cluster. Due to some recurring safety issues, it was decided that the integrating contractor, Kaiser-Hill, would assume direct control of this effort through day-to-day management and supervision. The subcontractor (Environmental Chemical Corp. {ECC}) formerly performing the D&D scope continued to function within the new framework. Over the next few months, changes to supervisors, safety staff, and craft support took place. D&D of the Building 865 Cluster was complete in September 2003. Following are the dates and duration of the key activities for the 865 Closure Project D&D contract:

- Strip-Out — September 00 through February 03
- Asbestos Abatement — February 03 through July 03
- PDS — September 01 through August 03
- Demolition Activities — February 03 through September 03
- Demobilization — October 03

XIII. Final Disposition of Wastes

See Section VII.

XIV. Next Steps for the Area

The Building 865 slab, pits, under building utilities and lines, along with characterization of the soil, was turned over to ER in the Facility Disposition RSOP Notification Letter.

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Appendix 1
Maps

Article 1 **RFETS Area Plot Plan**

Article 2 **865 Cluster Plot Plan**

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Appendix 2
Rocky Flats Environmental Technology Site Regulatory Contact Records

Article 1	**Contact Record, January 19, 00** **Discussed proposed equipment removal activities for B865**
Article 2	**Contact Record, November 15, 01** **Discussion concerning management of painted concrete from Building 865, etc.**
Article 3	**Contact Record, May 9, 02** **CDPHE comments on the RSOP Notification Letter for the RCRA Units in B865 and B866**
Article 4	**Contact Record, April 03, 03** **CDPHE and RFFO approval to breech Building 865 to demolish a Transite Blast Wall**
Article 5	**Contact Record, June 5, 03** **865 Demolition Path-Forward Plan**
Article 6	**Contact Record, August 12, 03** **Building 867 Demolition**
Article 7	**Contact Record, August 13, 03** **Building 867 Demolition**
Article 8	**Contact Record, August 22, 03** **Building 865 Demolition, Low Bay**
Article 9	**Contact Record, September 11, 03** **Building 867 Demolition**
Article 10	**Contact Record, September 22,03** **866 Demolition /865 Slab**
Article 11	**Contact Record, September 25, 03** **Building 866 Pre-Demolition Survey Results**

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Article 1
Contact Record, January 19, 00

Discussed proposed equipment removal activities for B865

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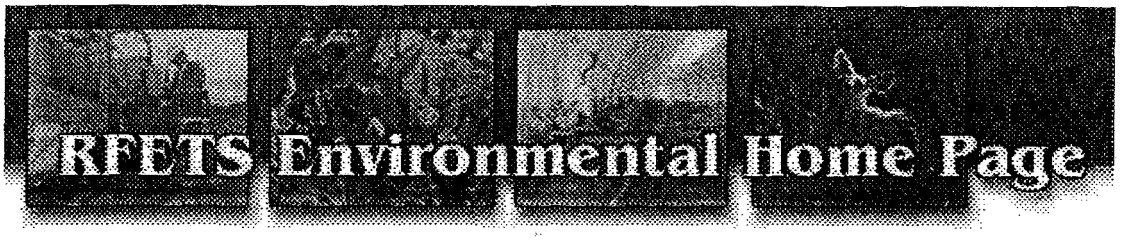

Welcome to the RFETS Regulatory Contact Record Database

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Building: 865

Author:

Regulatory Contact:

Date Range: From To

Keyword:

Submit Query Clear Form

<< < > >> (6 of 16)

Number	326
Date and Time	1/19/2000 8:30:00 PM

Primary Site Contact	Gary Konwinski	Primary Reg Contact	Dave Kruchek
SecondaySite Contact		Seconday Reg Contact	

Unit	Building	Site Phone	Agency
	865	*2729	CDPHE

Purpose

Discussed proposed equiment remvoal activities for B865

Discussion

Attendees: Dave Kruchek, Ed Pietsch, Ron Calrson, Jerry Long, Gary Knowinski, Rebecca Mitchell and Bob Cathel. Vent System (as discussed during 7/2/99 meeting with CDPHE) Regarding the system that vents to a "drop box", Chris is of the opinion that this doesn't have a pathway to the environment. This is a system of stand along vents that draw particulates away from a machine (e.g., bandsaw and grinders). All of these vents are connected to a single overhead duct, which then deposits the particulate matter into a drop box. The collected particulate materials are then bagged out and managed appropriately. Pursuant to sections 1.1.4 and 1.1.5 of the Decommissioning Program Plan (DPP),

removal of certain fixed equipment and systems conforming to these sections may not need additional RFCA decision documents beyond the DPP. This decision would be based on collaborative agreement that the activity does not require such a decision document. Furthermore, the Site project point of contact will: -Document the agreement in the manner agreed to during the meeting with the LRA (Lead Regulatory Agency, CDPHE) project point of contact (this contact record satisfies this requirement). -Document the decision in the Administrative Record. -Monitor the project scope to ensure it remains within that agreed to and -Notify the LRA before the project goes out of scope if possible, in sufficient time to initiate consultation with the LRA on the issue. Based on the referenced sections of the DPP, the consultative process was invoked for this scope of work. A meeting was held with personnel from CDPHE, DOE, K-H and RMRS in attendance. The general scope of work includes removal of equipment within the beryllium Machine Shop and the Utility Room and the removal of ductwork as described in the "Vent System" discussion above. The ductwork will be removed or severed from the main conduit at points easily accessible to workers (i.e., not in the upper spaces of the building). Where the ductwork is severed, it will be isolated in accordance with Industrial Hygiene direction. Also, Dave Kruchek stated that where the ductwork is severed, that these "openings" be plugged in some manner (i.e., tape plastic sheeting over the opening). The equipment and removed ductwork will be packaged in waste containers, in accordance with site approved procedures. IT is assumed that the machinery and ductwork is contaminated with beryllium and will be handled accordingly. Dave Krucheck stated that he was especially concerned with the potential to contaminate workers with beryllium dust. This work will follow site-approved procedures for handling such contaminated equipment. Furthermore, Andre Gonzales was identified, as the Industrial Hygienist that will be overseeing this activity. Prior to beginning this activity, the RMRS project manager will provide the LRA project point of contact with an overview of work controls for this activity, especially worker safety regarding beryllium dust control (Job Hazard Analysis).

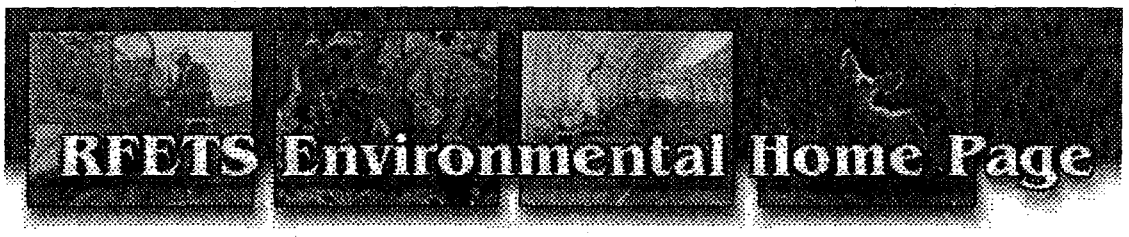
Follow-Up

Please contact Doug Schlagel at extension 4175 for assistance with this page.

Article 2
Contact Record, November 15, 01

Discussion concerning management of painted concrete from Building 865, ete.

31



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Building: 865
Author:
Regulatory Contact:
Date Range: From To
Keyword:
Submit Query Clear Form

<< < > >> (9 of 16)

Number	519
Date and Time	11/15/2001 11:00:00 AM

Primary Site Contact	Steve Nesta	Primary Reg Contact	Dave Kruchek
SecondaySite Contact		Seconday Reg Contact	

Unit	Building	Site Phone	Agency
	865	*6386	CDPHE

Purpose

Discussion concerning management of painted concrete from Buildings 865, 442L, the 800 area Type 1 facilities (830, 864, and 885), and the Type 1 facilities in the 886 Cluster Phase 1 PDSR (886, T886A, 875, 888, and 888A)

Discussion

A discussion was held between Mr. Nesta and Mr. Kruchek concerning the statements in either the RLCRs or the PDSRs for the above buildings, which state that the painted concrete will be disposed of as PCB Bulk Product Waste at a sanitary landfill. A clarification was made that if the concrete meets the criteria of the Concrete RSOP, it may be used as backfill on site. Mr. Kruchek agreed with this clarification.

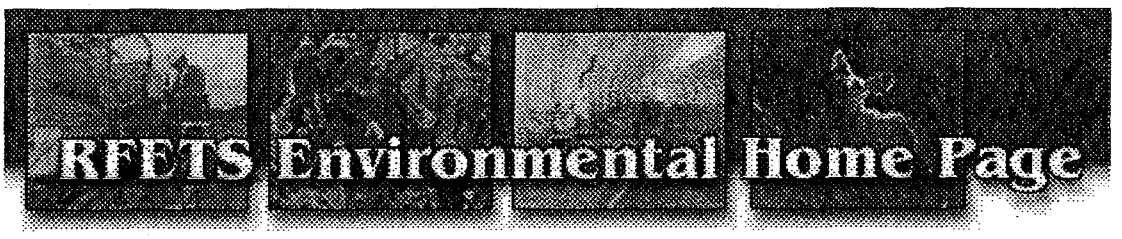
Follow-Up

Please contact Doug Schlagel at extension 4175 for assistance with this page.

Article 3
Contact Record, May 9, 02

CDPHE comments on the RSOP Notification Letter for the RCRA Units in B865 and B866

34



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Building: 865
Author:
Regulatory Contact:
Date Range: From To
Keyword:
Submit Query Clear Form

<< < > >> (12 of 16)

Number	678
Date and Time	5/9/2002 2:30:00 PM

Primary Site Contact	Kim Myers, 7106	Primary Reg Contact	James Hindman
SecondaySite Contact		Seconday Reg Contact	

Unit	Building	Site Phone	Agency
	B865, B866		CDPHE

Purpose

Discussion of CDPHE comments on the RSOP Notification Letter for the RCRA Units in B865 and B866 submitted under the Component Removal, Size Reduction, and Decontamination Activities RSOP, and to document the revised management of waste generated under this RSOP Notification Letter.

Discussion

James and I discussed our previous conversation in which I had stated the project's approach to management of the interim status RCRA units 40.17, 40.18, 40.19, and all associated ancillary equipment, which was different from what was stated in the RSOP Notification Letter 02-DOE-00217. In this conversation we discussed that although "clean closure" had not been attained for this system,

the system (tanks and ancillary equipment) did not need to be disposed of as RCRA hazardous waste since the system failed only for cadmium (0.034 ppm), chromium (2.1 ppm), lead (1.2 ppm), and mercury (0.004 ppm) . Therefore, the system and all ancillary equipment will be disposed of as Low Level waste, unless the system can also be decontaminated for radioactive contamination, in which case it will be disposed of as non-radioactive solid waste. Additionally, we discussed the comments from CDPHE received via email, concerning this same RSOP Notification Letter. The first comment requested more detailed maps or drawings. However, the maps and drawings that were provided are the only ones the site has available. After again reviewing what had been provided, James agreed that these were sufficient. The second comment from CDPHE was based on a "cut and paste" error in the RSOP Notification letter, in which the hazardous waste code D004 (arsenic) was applied to the system. This is incorrect and was a "cut and paste" error from a previous document. The third comment addressed the "Clean Closure Option #3, from the Component Removal, Size Reduction and Decontamination RSOP, for the sump 145A in B865. We discussed that the sump did not meet clean closure for beryllium and nickel, but all other analytes (including applicable listed constituents) were below RFCA Attachment 5, Table 2. Tier II – Groundwater Action Levels. Since neither of these constituents would make the concrete sump hazardous waste, the subcontractor performing the decommissioning in B865 will either remove the concrete sump as Low Level solid waste, or perform appropriate characterization sampling to determine if the concrete meets free release criteria, as defined in the Concrete Recycling RSOP. The fourth comment references one of the photos provided in the RSOP Notification Letter. This photo labels elevated piping "from B883 to B866." In reality this is an error and should be labeled "from B865 to B866." The last CDPHE comment requested that IWCPs be provided. I explained that the subcontractor would not be using IWCPs, but that once a work package has been developed for this job, the package would be provided as part of the consultative process. Additionally, James asked about the covered sump in B866, which was addressed during B889 closure. I told him I believed that the sump had been closed during the RCRA closure activities associated with B889, but that I would do some research to validate this information. I reviewed several documents in the CERCLA AR associated with B889 closure and found nothing that addressed this sump in B866. Therefore unless further information is discovered that documents the RCRA closure of this sump, the sump and anything in the sump below the metal plate will be removed as LLM waste with the following EPA codes applied to the waste: D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D028, D029, D035, D038, D040, D043, F001, F002, F003, F005, F007, F008, and F009.

Follow-Up

Please contact Doug Schlagel at extension 4175 for assistance with this page.

Article 4
Contact Record, April 3, 03

CDPHE and RFFO approval to breach Building 865 to demolish a Transite Blast Wall

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: April 3, 2003/ 9:00 a.m.

Site Contact(s):	Mark Lesinski	J.R. Marschall,
Phone:	303-966-3723	303-966-2372
Regulatory Contact:	Dave Krucheck,	Steve Tower
Phone:	303-692-3328	303-966-2133
Agency:	CDPHE	DOE/RFFO

Purpose of Contact: CDPHE and RFFO approval to breech Building 865 to demolish a Transite blast wall.

Discussion

During the Building 865 D&D Weekly Progress Meeting, March 27, Mark Lesinski, Kaiser-Hill Construction, requested approval from Dave Kruchek, CDPHE, to remove the Transite blast panel on the west wall of the high bay in Building 865. Transite, an asbestos containing material, must be removed as part of the asbestos abatement process in the high bay before the building can be demolished. The blast wall consists of two layers of Transite approximately 16' wide by 24' tall. K-H plans to build a temporary wall consisting of studs and plastic sealed to the building wall completely enclosing the Transite wall. Two layers of plastic will be placed on the inside of the temporary wall. K-H will then proceed to remove the Transite layers from the inside of the building. Once the Transite is gone the temporary wall will prevent any contaminants from leaving the building. When the PDS is complete and the building cleared of contaminants the inside layer of plastic will be removed from the temporary wall leaving clean plastic to provide a barrier to the outside until the building is demolished.

An RSOP Notification letter was submitted under the RSOP for Component Removal, Decontamination, and Size Reduction Activities with the required 6-point analysis. Although it has not yet been approved, Dave Kruchek approved proceeding with the wall breach as described above by electronic mail sent on April 7, 2003.

Contact Record Prepared By: J.R. Marschall

Required Distribution: Additional Distribution:

P. Arnold, K-H 371
C. Deck, K-H
R. DiSalvo
C. Gilbreath, K-H 771
S. Gunderson, CDPHE
T. Hopkins, K-H 776
L. Kilpatrick, RFFO
J. Legare, DOE
R. Leitner, K-H 371
J. Mead, K-H ESS
S. Nesta, K-H RISS
K. North, K-H ESS/MS
B. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H
Jack Hanson, KHC
Dave Kruchek, CDPHE
Mark Lesinski, KHC
J.R. Marschall, K-H/RISS
Steve Tower, DOE/RFFO

Article 5
Contact Record, June 5, 03

865 Demolition Path-Forward Plan

40

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 6/5/03 – 0900 a.m.

Site Contact(s): D. A. Parsons, K-H – (DAP-012)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: 865 Demolition Path-Forward Plan

Meeting Attendance

D. Parsons, K-H
M. Lesinski, K-H
R. Neveau, K-H
D. Kruchek, CDPHE
M. McGrory, K-H
E. Kray, CDPHE
S. Tower, RFFO

Discussion

A meeting was held on 6/4/03 at 10:00am in T124A to discuss the *draft* 865 Demolition Path-Forward Plan (Revision 0, dated May 30, 2003) that was prepared by the 865 Project and given to D. Kruchek (CDPHE) and S. Tower (RFFO) on 5/29/03 for review.

A video recording of the 980 Pad InstaCote Test was viewed, and discussions on the contents of the path-forward plan were held. Minor edits of the plan were agreed upon and the meeting was adjourned. D. Parsons (K-H) has the action of making the agreed upon edits to the path-forward plan and then resubmitting the final plan to RFFO and CDPHE for review and concurrence. The final plan will remain as Revision 0, but with a new date.

In the meantime, D. Kruchek (CDPHE) and S. Tower (RFFO) gave a verbal concurrence to proceed with the general steps outlined in the *draft* path-forward plan. Approved work plans will be generated as needed to supplement the path-forward plan.

Discussions and agreements made during the meeting were:

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1) Since it was indicated that ER will be removing the slab, all agreements regarding specific activities associated with remediation of the slab will be provided to and implemented by ER. That is, agreements reached with D&D become requirements for ER. These agreements/plans will be implemented in addition to the ER RSOP requirements.
2) All removable contamination on surfaces will be removed, but it is expected that the slab is going to remain contaminated with fixed contamination, with potentially removable contamination in cracks and joints. Slab will be disposed as LLW/Be waste.
3) Instacote will be sprayed on top of the entire slab as protection from building demolition activities (falling debris, debris removal, etc) and potentially from weather related issues.
4) As the Instacote is removed (or gouges/openings are found), fixative will be sprayed on the slab to fix contamination and to prevent releases of contamination prior to and during slab demolition activities.
5) The pits/sumps/vaults in the slab will be removed, or completely decontaminated if they are going to be left in place.
6) Contamination includes not only uranium and Beryllium, but also RCRA and CERCLA hazardous constituents and substances, such as metals, VOCs, etc.
7) It is expected that appropriate air monitoring will be performed during this demolition.
8) It is expected that the slab will be removed immediately following demolition of the superstructure. However, if the slab will not be removed immediately following demolition of the superstructure then appropriate measures must be implemented to protect the contaminated slab until demolition does occur. It is expected that this demolition of the contaminated slab will occur as expeditiously as possible, and that a schedule for this activity will be provided to CDPHE prior to initiation of B865 demolition.

Contact Record Prepared By: D. A. Parsons, K-H

Required Distribution:

P. Arnold, K-H
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
T. Hopkins, K-H
L. Kilpatrick, K-H
J. Legare, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
W. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H

Additional Distribution:

K. Wiemelt, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
D. Parsons, K-H
M. Lesinski, K-H
R. Neveau, K-H
E. Kray, CDPHE
M. McGrory, K-H

Article 6
Contact Record, August 12, 03

Building 867 Demolition

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 8/12/03 – 1200 hrs.

Site Contact(s): M. Lesinski – (ML-014)
Phone: (303) 966-3509

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 867 Demolition

Meeting Attendance

D. Kruchek, CDPHE M. Lesinski, RISS S. Tower, RFFO

Discussion

During the B867 (West Plenum) status meeting held on Tuesday morning, 8/12/03, Mark Lesinski (RISS) discussed the Building 867 Anticipated Type 2 Pre-demolition Survey Report (PDSR). Based on the discussions regarding Rad and Be survey data on the clean side Fan Room along with proposed work controls, Dave Kruchek gave verbal concurrence to rig the exhaust ducts from that fan room today (covering the ends with plastic and set aside) prior to receiving final internal Be swipes of the exhaust.
In addition, a discussion of how the D & D for the West Plenum will proceed indicated that when the Be swipe results for the Plenum are received this afternoon I will call Mr Kruchek providing that no Be is detected post fixative the go ahead for demolition will be given. This ductwork will then be placed in a sanitary roll-off for disposal. I will at that time follow up with another contact record.

Contact Record Prepared By: Mark Lesinski

44

Required Distribution:

P. Arnold, K-H
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
T. Hopkins, K-H
L. Kilpatrick, K-H
J. Legare, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
W. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H

Additional Distribution:

M. Lesinski, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
J. Hindman, CDPHE
K. Wiemelt, K-H
E. Bryson, RFFO

NC

Article 7
Contact Record, August 13, 03

Building 867 Demolition

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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 8/13/03 – 1430 hrs.

Site Contact(s): M. Lesinski – (MLL-016)
Phone: (303) 966-3509

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 867 Demolition

Meeting Attendance

D. Kruchek, CDPHE M. Lesinski, RISS S. Tower, RFFO

Discussion

Based on our conversation this afternoon regarding Beryllium swipe results from the Building 867 plenum portion, authorization has been given to proceed with the demolition of this building. As we discussed, all of the follow-up smears were found to be non-detect. Therefore, there is no detectable Beryllium or Rad smearable on the outside or inside of the fan portion or the plenum portion of B867. The West Plenum has been deposted as a Beryllium area as well as deposted from a Rad Contaminated Area.

All the precautions as well as sampling protocols and PPE will be followed per the Work Package that was forwarded to you yesterday. Personal air pumps for sampling Beryllium and Rad will be worn by workers and perimeter air samplers will check for both contaminants as well to ensure worker safety.

In addition, the loading of sanitary waste from the fan portion of B867 will be loaded into trucks tomorrow for disposal.

The signed off PDSR for B867 including the Beryllium results will be forwarded to you tomorrow, 8/14/03.

Contact Record Prepared By: Mark Lesinski

Required Distribution:

P. Arnold, K-H
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
T. Hopkins, K-H
L. Kilpatrick, K-H
J. Legare, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
W. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H

Additional Distribution:

M. Lesinski, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
J. Hindman, CDPHE
K. Wiemelt, K-H
E. Bryson, RFFO

Article 8
Contact Record, August 22, 03

Building 865 Demolition, Low Bay

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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 8/22/03 – 1330 hrs.

Site Contact(s): Brian K. Corb – (RISS/ECC)
Phone: (303) 966-3509

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 865 Demolition, Low Bay

Meeting Attendance

D. Kruchek, CDPHE B. Corb, RISS/ECC

Discussion

The CDPHE approval of the B865 Low Bay PDSR, dated July 8, 2003, stipulated that the Asbestos Containing Material (ACM) such as roof flashing would be removed prior to demolition. Mr. Chaz McGlothlin and Mr. Mike Flannery, both Colorado State Certified Building Inspectors, inspected the exterior of B865 including the Low Bay roof. Asbestos materials found, roof caulking and tar impregnated roof flashing, will remain NON-FRIABLE during demolition The State demo permit has been completed appropriately according to this information.

During a teleconference held on Friday afternoon, August 22, 2003, Brian K. Corb (RISS/ECC) discussed the requirement and requested that based on this determination, demolition of the non-friable ACM was acceptable. Mr. Dave Kruchek gave verbal concurrence to proceed with the demolition of the B865 Low Bay.

Contact Record Prepared By: Brian Corb

Required Distribution: **Additional Distribution:**

Contact Record 8/25/03

50

P. Arnold, K-H
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
T. Hopkins, K-H
L. Kilpatrick, K-H
J. Legare, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
W. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H
M. Lesinski, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
J. Hindman, CDPHE
K. Wiemelt, K-H
E. Bryson, RFFO

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Article 9
Contact Record, September 11, 03

Building 867 Demolition

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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 9/11/03 – 0622 hrs.

Site Contact(s): M. Lesinski – (ML-017)
Phone: (303) 966-3509

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 867 Demolition

Meeting Attendance

D. Kruchek, CDPHE M. Lesinski, RISS

Discussion

During a phone message and subsequent meeting at the B865 cluster on Wednesday, September 10, 2003, Mark Lesinski (RISS) discussed the B867/868 slab demolition with Dave Kruchek. Based on survey data showing no Rad and no Be contaminants on the slabs for the East and West Plenum, the project is proceeding with removal of these slabs. Mr. Kruchek has reviewed surveys provided earlier on the B867 slab and concurred with the demo work. These slabs will be broken up, sections turned over, and re-surveyed prior to load out.

Contact Record Prepared By: Mark Lesinski

Required Distribution:

P. Arnold, K-H
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
T. Hopkins, K-H
L. Kilpatrick, K-H
J. Legare, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
W. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H

Additional Distribution:

M. Lesinski, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
J. Hindman, CDPHE
K. Wiemelt, K-H
E. Bryson, RFFO

Article 10
Contact Record, September 22, 03

866 Demolition /865 Slab

54

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 9/22/03 – 1500 hrs.

Site Contact(s): M. Lesinski – (ML-018)
Phone: (303) 966-3509

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 866 Demolition/865 Slab

Meeting Attendance

D. Kruchek, CDPHE M. Lesinski, RISS Brian Corb, ECC
Gwynn Aldrich, Rad Engineering

Discussion
On Thursday afternoon, September 18, 2003, discussions between David Kruchek, CDPHE, Brian Corb, Gwynn Aldrich and Mark Lesinski, KH B865 Project Manager, concerning B866 demo and B865 slab disposition yielded the following conclusions.

B865 Slab

1. The current status of the slab with areas of instacote torn and removed has shown no removable contamination from Be or DU. Therefore, refixing exposed areas with CC Fix is no longer required on the slab.
2. Remaining building debris on the slab will be consolidated on the Extrussion Press Pit, and a tarp placed over the pile. Loose instacote pieces will be segregated and placed in a waste connex.
3. The pile of debris will be handled with the slab waste and dealt with as Low Level Waste (LLW).
4. When demo of the slab proceeds, only high fixed contamination locations will require saw cutting.

B866 Demo

1. Since direct surveys of the slab have shown fixed contamination only in the sump and a section in the NW corner, only those areas will be saw cut for removal.

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2. As long as PDS results support the Pre-PDS surveys indicating that no Rad, (loose or fixed) exists on the walls and ceiling and that no Be is found, fixative will not be used other then on the slab and pit. The walls and ceiling will go as sanitary waste.
3. The slab (except the sump) will go as LLW due to multiple paint layers and the NW corner fixed contamination.
4. The sump will go as mixed waste to EnviroCare.
5. Potential underslab contamination will be sampled for during the removal process.

Contact Record Prepared By: Mark Lesinski

Required Distribution:

P. Arnold, K-H
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
T. Hopkins, K-H
L. Kilpatrick, K-H
J. Legare, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
W. Prymak, DOE
T. Rehder, USEPA
D. Shelton, K-H

Additional Distribution:

M. Lesinski, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
J. Hindman, CDPHE
K. Wiemelt, K-H
E. Bryson, RFFO
K. Myers, ENERGX
D. Parsons, D&DSC
B. Corb, ECC
G. Aldrich, PM Tech

Article 11
Contact Record, September 25, 03

Building 866 Pre-Demolition Survey Results

57

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: 9/25/03 – 0700 a.m.

Site Contact(s): D. A. Parsons (D&D) – (DAP-016)
Phone: (303) 966-6458

Regulatory Contact: David Kruchek, CDPHE
Phone: (303) 692-3328

Agency: CDPHE

Purpose of Contact: Building 866 Pre-Demolition Survey Results

---

Meeting Attendance

D. Parsons, RISS D. Kruchek, CDPHE S. Tower, RFFO

Discussion

The pre-demolition survey data for Building 866 was provided to David Kruchek (CDPHE) on Tuesday (9/23/03) and to Steve Tower (RFFO) on Wednesday (9/24/03) by Duane Parsons (RISS). Based on a review of the B866 pre-demolition survey data, David Kruchek and Steve Tower gave verbal approval to proceed with the demolition of B866 provided all other demolition requirements have been met.

In the mean time, minor edits to the B866 pre-demolition survey report (PDSR) will be made and then the report will be routed for internal KH review as well as DOE and CDPHE review. Minor edits to the B866 PDSR will include a discussion of the beta background readings.

Contact Record Prepared By: D. A. Parsons

Required Distribution:

D. Bell, RFFO
C. Deck, K-H
R. DiSalvo, RFFO
C. Gilbreath, K-H
S. Gunderson, CDPHE
L. Kilpatrick, K-H
J. Legare, RFFO
D. Maxwell, RFFO
R. Leitner, K-H
J. Mead, K-H
S. Nesta, K-H
K. North, K-H
T. Rehder, USEPA
D. Shelton, K-H
C. Zahm, K-H

Additional Distribution:

M. Lesinski, K-H
F. Gibbs, K-H
D. Kruchek, CDPHE
S. Tower, RFFO
Karen Wiemelt, K-H

Appendix 3
865 Cluster Characterization Reports

Refer to the attached Articles 1 through 8 for copies of the PDSR and RLCR cover pages, signature pages, and CDPHE concurrence letters.

Pre-Demolition Survey Reports (PDSRs)

Article 1 **Building 865 Low Bay**
PDSR for the Building 865 Low Bay, Revision 0, dated April 15, 2003
CDPHE concurrence letter dated July 8, 2003

Article 2 **Building 865 High Bay**
PDSR for the Building 865 High Bay, revision 0, dated August 12, 2003
CDPHE concurrence letter dated August 22, 2003

Article 3 **Building 866**
PDSR for the Building 866 Closure Project, Revision 0, dated September 23, 2003
CDPHE concurrence letter dated October 9, 2003

Article 4 **Building 867**
PDSR for the Building 867 Plenum Fan Room closure Project, Revision 0, dated August 14, 2003
CDPHE concurrence letter dated August 26, 2003

Article 5 **Building 868**
PDSR for the Building 868, revision 0, dated July 23, 2003
CDPHE concurrence letter dated August 8, 2003

Reconnaissance Level Characterization Reports (RLCRs)

Article 6 **Building 865, 866 and 868**
RLCR for the 865 Cluster Closure Project, Revision 0, dated September 17, 2001
CDPHE concurrence letter dated October 17, 2002

Article 7 **Building 863**
RLCR for the 800 Area Type 1 Cluster Closure Project, Revision 0, dated June 15, 2001
CDPHE concurrence letter dated October 11, 2002

Article 8 **Building C-865 Low Bay**
PDSR for the Building 865 High Bay, Revision 0, dated April 15, 2003
CDPHE concurrence letter dated August 12, 2003

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Rocky Flats Environmental Technology Site

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 865 LOW BAY

REVISION 0

April 15, 2003

CLASSIFICATION REVIEW NOT REQUIRED PER EXEMPTION NUMBER CEX-005-02

Article 1
Building 865 Low Bay

- **PDSR for the Building 865 Low Bay, Revision 0, dated April 15, 2003**
- **CDPHE concurrence letter dated July 8, 2003**

62

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 865 LOW BAY

REVISION 0

April 15, 2003

Reviewed by: _____ Date: 4-14-03
Don Risoli, Quality Assurance

Reviewed by: _____ Date: 4/15/03
D.P. Snyder, RISS ESH&Q Manager

Approved by: _____ Date: 4/15/03
Karen Wiemelt, K-H D&D Project Manager

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

July 8, 2003

Mr. Joe Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Pre-Demolition Survey Report (PDSR) for Building 865 Lowbay - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 865 Lowbay, Revision 0 dated April 15, 2003. Based on the information contained in this PDSR, we are hereby approving the PDSR for the Lowbay of B865 with the following conditions:

1. All remaining asbestos containing materials, such as the roof flashing, will be removed prior to demolition as indicated.
2. The remaining radiological contamination in the slab will be properly marked, fixed and protected during demolition, and removed after demolition as indicated. This specifically refers to the contamination in the "crack" in the floor.
3. It is our understanding that the demolition of the Lowbay will occur during the demolition of B865, after approval of the PDSR for the remainder of the building, and will not be performed as a separate action.
4. Considering that work is continuing in the remaining sections of B865, there will need to be additional investigations to show that the Lowbay has not been contaminated if the separation between the Lowbay and the remainder of the building is compromised.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Administrative Records Building T130G
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

64

Article 2
Building 865 High Bay

- **PDSR for the Building 865 High Bay, Revision 0, dated August 12, 2003**
- **CDPHE concurrence letter dated August 22, 2003**

65

Rocky Flats Environmental Technology Site

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 865 HIGH BAY CLOSURE PROJECT

REVISION 0

August 12, 2003

CLASSIFICATION REVIEW NOT REQUIRED PER EXEMPTION NUMBER CEX-005-02

66

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 865 HIGH BAY CLOSURE PROJECT

REVISION 0

August 12, 2003

Reviewed by: _____ Date: 8/14/03
Don Risoli, Quality Assurance

Reviewed by: _____ Date: 8/14/03
D.P. Snyder, RISS ESH&Q Manager

Approved by: _____ Date: 8/14/03
Karen Wiemelt, K-H D&D Project Manager

Revised 07/03

CORRES. CONTROL
INCOMING LTR NO.

00810 RF03

DUE DATE
ACTION

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2003 AUG 27 P 3:17
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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department of Public Health and Environment

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BERARDINI, J. H.	X	
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CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.		
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
PARSONS, D.	X	
WIEMELT, K.	X	
NESTA, S.	X	
BROOKS, L.	X	

COR. CONTROL	X	
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

8/27/03 bg
Date By

Ref. Ltr. #

DOE ORDER #
NONE

August 22, 2003

Mr. Joe Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Pre-Demolition Survey Report (PDSR) for Building 865 Highbay - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 865 Highbay, *Revision 0 dated August 12, 2003*. Based on the information contained in this PDSR, we are hereby approving the PDSR for the Highbay of B865.

Please provide a replacement page 7 of 10, correcting the text in Section 5 Physical Hazards. The current text states that the crane rails and columns will be disposed of as Low Level and Beryllium waste, which is inconsistent with the findings and conclusions discussed in this PDSR. As such, this statement needs to be changed to reflect the correct disposal of this, as well as the remainder of the superstructure of the Highbay, as Beryllium contaminated solid waste.

It is our understanding that although the floor of B865 does not meet free-release levels and will be removed and disposed as low level and beryllium waste, we understand that the surface of the InstaCote on the floor of B865 does meet the PDS free-release levels for both beryllium and radiological concerns. As such, please provide the appropriate confirmation information as well as appropriate statements to this effect.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Administrative Records Building, T130G
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

68

Article 3
Building 866

- **PDSR for the Building 866 Closure Project, Revision 0, dated September 23, 2003.**

- **CDPHE concurrence letter dated October 9, 2003**

Rocky Flats Environmental Technology Site

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 866 CLOSURE PROJECT

REVISION 0

September 23, 2003

CLASSIFICATION REVIEW NOT REQUIRED PER EXEMPTION NUMBER CEX-005-02

70

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 866 CLOSURE PROJECT

REVISION 0

September 23, 2003

Reviewed by: _____ Date: 9/25/03
Don Risoli, Quality Assurance

Reviewed by: _____ Date: 9/25/03
D.P. Snyder, RISS ESH&Q Manager

Approved by: _____ Date: 9/25/03
Karen Wiemelt, K-H Area 1 D&D Project Manager

71

RECEIVED

2003 OCT 15 A 8

Revised 10/03

CORRES. CONTROL
INCOMING LTR NO.

00951 RF03

DUE DATE
ACTION

STATE OF COLORADO

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Douglas H. Benevento, Executive Director

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BROOKS, L.	X	
BUTLER, L.	X	
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DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
HIETT, S. B.	X	
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
ZAHM, C.	X	
Parsons, D	X	
Wiemelt, K	X	
Nesta, S	X	

COR. CONTROL	X	
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

10/15/03 LC
Date By

Ref. Ltr. #

DOE ORDER #
5400.1

October 9, 2003

Mr. Joe Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Pre-Demolition Survey Report (PDSR) for Building 866 - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 866, Revision 0 dated September 23, 2003, received October 9, 2003. Based on the information contained in this PDSR, we approve the PDSR for B866.

As discussed in this PDSR neither the floor nor sump in B866 meet free-release levels. The floor having radiological contamination above free-release levels, and the sump having radiological, RCRA, and beryllium contamination. As a precaution to prevent possible release of contamination during demolition, the floor and sump will be sprayed with fixative. The floor will be managed and disposed as LLW, and the sump as low-level mixed waste (LLMW). Utilizing the consultative process this was previously discussed and agreed to, as indicated in the Contact Record dated September 22, 2003.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Administrative Records Building T130G
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

72

Article 4
Building 867

- **PDSR for the Building 867 Plenum Fan Room Closure Project, Revision 0, dated August 14, 2003**

- **CDPHE concurrence letter dated August 26, 2003**

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Rocky Flats Environmental Technology Site

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 867 PLENUM FAN ROOM CLOSURE PROJECT

REVISION 0

August 14, 2003

CLASSIFICATION REVIEW NOT REQUIRED PER EXEMPTION NUMBER CEX-005-02

74

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 867 PLENUM FAN ROOM

REVISION 0

August 14, 2003

Reviewed by: _____ Date: 8/14/03
Don Risoli, Quality Assurance

Reviewed by: _____ Date: 8/14/03
D.P. Snyder, RISS ESH&Q Manager

Approved by: _____ Date: 8/14/03
Karen Wiemelt, K-H D&D Project Manager

RECEIVED

2003 SEP 4 P 3:30

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Revised 08/03

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00828 RF03

DUE DATE
ACTION

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BROOKS, L.	X	
BUTLER, L.		
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.		
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
SWARTZ, J. M.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
PARSONS, D	X	
WIEMELT, K.	X	
NESTA, S.	X	

COR. CONTROL	X	
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

9/4/03 by
Date By

Ref. Ltr. #

DOE ORDER #
NONE

STATE OF COLORADO

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Douglas H. Benevento, Executive Director

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(303) 692-3090

Colorado Department
of Public Health
and Environment

August 26, 2003

Mr. Joe Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Pre-Demolition Survey Report (PDSR) for Building 867 - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 867, Revision 0 dated August 14, 2003, received on August 26, 2003. Based on the information contained in this PDSR, we are hereby approving the PDSR for B867.

As indicated in the August 12 and 13, 2003 Contact Records we previously gave verbal concurrence to demolish B867.

Although it may be possible that the concrete generated from the demolition of B867 (the slab) could meet the free-release requirements and be recycled on site, the slab under B867 is not specifically included in this PDSR investigation. As such, it is our understanding that the concrete material will not be recycled and will be properly characterized and, at a minimum, will be sent off site to a solid waste landfill.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
~~Administrative Records~~ Building T130G
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

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Article 5
Building 868

- **PDSR for the Building 868, Revision 0, dated July 23, 2003**
- **CDPHE concurrence letter dated August 8, 2003**

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Rocky Flats Environmental Technology Site

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 868

REVISION 0

July 23, 2003

CLASSIFICATION REVIEW NOT REQUIRED PER EXEMPTION NUMBER CEX-005-02

18

PRE-DEMOLITION SURVEY REPORT (PDSR)

BUILDING 868

REVISION 0

July 23, 2003

Reviewed by: _____ Date: 7/23/03
Don Risoli, Quality Assurance

Reviewed by: _____ Date: 7/23/03
D.P. Snyder, RISS ESH&Q Manager

Approved by: _____ Date: 7/24/03
Karen Wiemelt, K-H D&D Project Manager

STATE OF COLORADO

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Douglas H. Benevento, Executive Director
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(303) 692-3090

Colorado Department
of Public Health
and Environment

August 8, 2003

Mr. Joe Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Pre-Demolition Survey Report (PDSR) for Building 868 - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the PDSR for Building 868, Revision 0 dated July 23, 2003, received on August 6, 2003. Based on the information contained in this PDSR, we are hereby approving the PDSR for B868.

As indicated in the July 31, 2003 Contact Record we gave verbal concurrence to demolish B868, and discussed two changes to the PDSR. One of these requested changes was to remove the word "surfaces" from the last sentence of Section 7. This change in the text has not occurred. However, since this change was for clarification, and is not a substantial change, it is not deemed necessary at this time. It is understood that the concrete (not just the surfaces) will be sent offsite to an appropriate landfill and not utilized onsite as backfill.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Administrative Records Building T130G
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

80

Article 6
Buildings 865, 866, and 868

- **RLCR for the 865 Cluster Closure Project, Revision 0, dated September 17, 2001**

- **CDPHE concurrence letter dated October 17, 2002**

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Rocky Flats Environmental Technology Site

RECONNAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR)

865 CLUSTER CLOSURE PROJECT
(Buildings 865, 866, 867 and 868)

REVISION 0

September 17, 2001

RECONNAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR)

865 CLUSTER CLOSURE PROJECT

(Buildings 865. 866, 867 and 868)

REVISION 0

September 17, 2001

Reviewed by: _____ Date: 9/18/01
Steve Luker, Quality Assurance

Reviewed by: _____ Date: 9/17/01
Michael Chritton, RISS ESH&Q Manager

Approved by: _____ Date: 9/17/01
Kent Dorr, K-H Project Manager

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

October 17, 2001

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: **Reconnaissance Level Characterization Report (RLCR) for Buildings 865, 866, 867, and 868 - Concurrence**

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR for the 865 Cluster Closure Project (Buildings 865, 866, 867, & 868), Revision 0 dated September 17, 2001, which was received on October 4, 2001. Based on the information contained in this RLCR, we are hereby concurring with the Type 2 designation for Buildings 865, 866, 867, and 868.

We also recognize official receipt of the Hazards Analysis (HA) for Building 865, which is indicated to have been mothballed. Since the mothballing of B865 is now being officially recognized, we would like to take this opportunity to formally state that this building has been in a mothballed state for quite some time. B865 was mothballed prior to providing the RLCR or the HA, which is counter to the requirements of the Decommissioning Program Plan (DPP), Section 3.3.4. The DPP requires submittal of the RLCR prior to mothballing as well as submittal of the HA and meetings to discuss any potential hazards or releases to the environment which might occur during the mothball period. The proposed mothballing of B865 was previously discussed during various decommissioning meetings, in which the proposed modifications to building systems were themselves modified so that environmental concerns would not be adversely effected inside or outside the building. As such, we have been aware of the mothballed condition of B865, as well as the generation of the HA, and have been working closely with DOE and its contractors to remove the equipment and material from B865 and make the requested modifications to B865. Although B865 may have been mothballed prior to performing the RLCR as required in the DPP we have utilized the consultative process to provide and acquire the information necessary to properly perform the decommissioning activities as well as allow the activities that have led to the mothballing of B865 prior to receipt of the RLCR. The consultative process has also been utilized in developing the HA. In addition, the mothballing of B865 prior to performing the RLCR is recognized as a unique situation that developed and should not be repeated for other buildings on site.

Article 7
Building 863

- **RLCR for the 800 Area Type 1 Cluster Closure Project, Revision 0, dated June 15, 2001**
- **CDPHE concurrence letter dated October 11, 2002**

85

Rocky Flats Environmental Technology Site

RECONNAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR)

800 AREA TYPE 1 CLUSTER CLOSURE PROJECT

(Buildings 830, 863, 864, 885, T883D, & Tanks Slabs 020, 021, and 026)

REVISION 0

June 15, 2001

RECONNIAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR)

800 AREA TYPE 1 CLUSTER CLOSURE PROJECT

(Buildings 830, 863, 864, 885, T883D, & Tanks Slabs 020, 021, and 026)

REVISION 0

June 15, 2001

Reviewed by: _____ Date: 6/18/01
Steve Luker, Quality Assurance

Reviewed by: _____ Date: 6/18/01
Michael Chritton, RISS ESH&Q Manager

Approved by: _____ Date: 6/19/01
Kent Dorr, K-H Project Manager

87

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Laboratory and Radiation Services Division
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Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

October 11, 2001

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Reconnaissance Level Characterization Report (RLCR) for the 800 Area Type 1 Cluster Closure Project Buildings - Concurrence

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR for the 800 Area Type 1 Cluster Closure Project Buildings, Revision 0 dated June 15, 2001, which was received on August 16, 2001. Based on the information contained in this RLCR, as well as the supplemental data requested and provided, we are hereby concurring with the Type 1 designation for the 800 Area Type 1 Cluster Buildings. The 800 Area Type 1 Cluster facilities are identified as Buildings 830, 863, 864, 885, T883D, and Tanks Slabs 020, 021, and 026.

Although it is not necessary to provide a corrected copy, it was noted that Attachment A – The Facility Location Map does not properly identify Buildings 885 or 864.

It is indicated in this RLCR that the concrete from Buildings 885, 864 and 830 will be sent to a solid waste landfill as PCB Bulk Product Waste, even though the levels of PCBs appear to be below current soil action levels as well as "free-release" levels. If this decision were to change and the concrete to be considered for possible recycling, totals analysis must be submitted to properly determine that the concrete is inert (does not contain hazardous constituents above levels of concern) for Buildings 885 and 830.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, FC, RFFO
Tim Rehder, EPA
Duane Parsons, KH
Frank Gibbs, KH
Dave Shelton, KH
Administrative Records Building 850

Article 8
Building C-865

- **RLCR for the Group 11 and Group 15 Closure Projects, Revision 0, dated February 22, 2002**

- **CDPHE concurrence letter dated April 12, 2002**

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Rocky Flats Environmental Technology Site

RECONNAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR)

GROUP 11 AND GROUP 15 CLOSURE PROJECTS

B850, B890, 881C (CT2, South Tower and CT3, East Tower), 883C (881CT4, North Tower), 881G, 881H, C-865 and T690N; and T891D, T891E, T891F, T893A, T893B, T900E and T904A

REVISION 0

February 22, 2002

90

RECONNAISSANCE LEVEL CHARACTERIZATION REPORT (RLCR)

GROUP 11 AND GROUP 15 CLOSURE PROJECTS

B850, B890, 881C (CT2, South Tower and CT3, East Tower), 883C (881CT4, North Tower), 881G, 881H, C-865 and T690N; and T891D, T891E, T891F, T893A, T893B, T900E and T904A

REVISION 0

February 22, 2002

Reviewed by: _____ Date: 3/7/02
Paul Miles, Quality Assurance

Reviewed by: _____ Date: 3/7/02
Duke Synder, RISS ESH&Q Manager

Approved by: _____ Date: 3/7/02
Kurt Kehler, K-H Project Manager

C11

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Colorado Department
of Public Health
and Environment

April 12, 2002

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Reconnaissance Level Characterization Report (RLCR) for Group 11 and 15 - Concurrence

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the RLCR for Group 11 and 15 Closure Projects, Revision 0 dated February 22, 2002, which was received on April 9, 2002. Based on a review of the information contained in the RLCR we are hereby concurring with the Type 1 designation for B850, B890, B881C (south and east units), B883C, B881G, B881H, C865, T690N, T891D, T891E, T891F, T893A, T893B, T900E, and T904A.

Although your cover letter accompanying this RLCR identified T991E and T989F as included in this RLCR, it is believed the appropriate facilities are T891E and T891F.

These facilities are identified as Type 1 Facilities, however, it is recognized that some of them may have been, or currently are, still in use and that it may be necessary to perform additional investigations after use and prior to demolition or sale. The consultative process should be utilized to acquire and provide the additional information prior to final disposition of these facilities.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
[redacted], KH
Frank Gibbs, KH
Dave Shelton, KH
Administrative Records Building T130G

92

Appendix 4

Closure Summery Report for Interim Status RCRA Units 40.17, 40.18, and 40.19 in Building 865 and 866

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CLOSURE SUMMARY INFORMATION FOR INTERIM STATUS RCRA UNITS 40.17, 40.18, AND 40.19 IN BUILDINGS 865 AND 866

Pursuant to the *Rocky Flats Environmental Technology Site's (RFETS) "Closure Plan for Interim Status Units at RFETS,"* Rev. 2/15/2000, the *Rocky Flats Environmental Technology Site's (RFETS) "RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities, Notification Letter,* February 12, 2001*"* (02-DOE-00217), Kaiser-Hill Company L.L.C. is submitting the following closure summary information for the units in Buildings 865 and 866.

This summary information pertains to RCRA closure activities for Tanks T-1, T-2, T-3, ancillary piping, pumps, secondary containment in B866, a "sump tank" and ancillary equipment in B866, a sump (145A) located in B865 and process waste lines in B865 and between B865 and B866. This summary is a requirement of Section 5, Closure of RCRA –Regulated Units, of the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities. This report contains a description of major closure activities and any deviations from those stated in the RSOP Notification Letter and other relevant information.

1.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Closure activities were conducted under the following Work Packages.

- JHA-017, General Equipment Dismantlement (Building 865 piping)
- B866 Task Plan and Demolition Plan
- JHA-066 and Task Plan, B866 RCRA Tank Draining/Drum Pumping
- ER Field Implementation Plan (FIP) for B865 Slab Removal (Envirocon)

As discussed in the RSOP Notification Letter the piping from Building 865 out to Building 866, was managed as LLW. Approximately 2.1 m^3 of LLW was generated from this pipe removal action. However, when work began on removal of the tanks and ancillary equipment in B866 it was discovered that there was liquid from the clean closure activities that had occurred in 1998. This liquid, approximately 100 gallons, was collected in a tanker and managed by the Alternative Water Treatment System, based on sampling and characterization.

After the water was removed from the system, the tanks were opened, and sludge was discovered in the bottom of the tanks. Sampling was conducted and the sludge was characterized as hazardous for lead, cadmium and chromium. The sludge was physically removed and packaged into 6 drums (1130 lbs. or 1.26 m^3). Because the sludge could not be completely removed to meet the debris treatment standard, the tanks and ancillary equipment, from Building 866 were packaged and disposed of as LLMW consisting on 33.7 m^3 or 4752 lbs. Management of the tanks and ancillary equipment as LLMW was an exception to the management called out in the RSOP Notification Letter.

The sump in B866 was removed and managed as LLMW (7444 lbs. or 5.1 m^3), as denoted in the RSOP Notification Letter. However, due to previous WSRIC characterization and site policy of not double listing EPA codes, the following are the EPA codes applied to this waste stream: D004, D005, D009, D010, D028, D029, D043, F001, F002, F005, F007, F009.

The sump 145A that remained in the Building 865 Highbay slab will be removed by RISS Environmental remediation. It is estimated that this sump consists of 0.11 m^3 of LLW.

2.0 SUMMARY

The requirements stated in the RSOP Notification Letter for closure of RCRA Interim Status Units 40.17, 40.18, and 40.19 has been fulfilled. The tanks and ancillary equipment has been disassembled and packaged as LLW or LLM waste for appropriate disposal.

Appendix 5
CDPHE RSOP Notification Concurrence

Building 865

Article 1	January 23, 2002, Facility Component RSOP – Component removal and decontamination activities
Article 2	June 7, 2002, Facility Component RSOP – Closure of RCRA Tank Units 40.17, 40.18, and 40.19 in Buildings 865 and 866
Article 3	April 29, 2003, Facility Component RSOP – Removal of a portion of the exterior wall
Article 4	August 22, 2003, Facility Disposition RSOP– Demolition of Building 865

Building 866

Article 5	January 31, 2002, Facility Component RSOP – Component removal and decontamination activities
Article 6	June 7, 2002, Facility Component RSOP – Closure of RCRA Tank Units 40.17, 40.18, and 40.19 in Buildings 865 and 866
Article 7	October 9, 2003, Facility Disposition RSOP – Demolition of Building 866

Building 867

Article 8	November 29, 2001, Facility Component RSOP – Component removal and decontamination activities
Article 9	October 8, 2003, Facility Disposition RSOP – Demolition of Building 867

Building 868

Article 10	November 29, 2001, Facility Component RSOP – Component removal and decontamination activities
Article 11	August 22, 2003, Facility Disposition RSOP – Demolition of Building 868

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Article 1

January 23, 2002, Facility Component RSOP – Component removal and decontamination activities

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Colorado Department
of Public Health
and Environment

January 23, 2002

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Building 865 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has received your January 14, 2002 letter, received on January 22, 2002, notifying us of your intent to utilize the Component RSOP for component removal and decontamination activities that are to occur in Building 865. We hereby agree that the appropriate activities may proceed utilizing the Component RSOP.

Although it is stated in your letter that the building shell, including the floor, will not be breached, floors are included (checked) on the activity checklist. It is our understanding that this was checked by mistake, and that floors will not be removed. If this is the case, please provide a replacement page showing the correct checklist for component removal, which should not include floors.

It is also surprising to see that decontamination of the floors is not included in this notification. It is our understanding that the floors will be decontaminated per the Component RSOP. As such, please provide a replacement page showing the correct checklist for decontamination, which should include floors.

It is indicated in your letter that the subcontractor will conduct work in accordance with his own work control documentation. Since the approved Component RSOP includes the work process to be followed as an integral part of the various activities to be performed, any substantive variation from the approved process must be identified and submitted for our approval. As indicated in your letter the consultative process may be utilized to

provide this information as well as to keep us informed of the decommissioning strategy or any changes thereto prior to performing the decommissioning activities.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, RFFO
Tim Rehder, EPA
Kent Dorr, KH
Frank Gibbs, KH
Dave Shelton, KH
Dyan Foss, KH
Administrative Records Building 850

Article 2

June 7, 2002, Facility Component RSOP – Closure of RCRA Tank Units 40.17, 40.18, and 40.19 in Buildings 865 and 866

100

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Jane E. Norton, Executive Director

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Colorado Department
of Public Health
and Environment

June 7, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of RCRA Tank Units 40.17, 40.18, and 40.19 in Buildings 865 and 866

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed your February 12, 2002 letter and the accompanying notification package received on February 15, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of the remaining portions of interim status RCRA Tank Units 40.17, 40.18, and 40.19 located in Buildings 865 and 866. RCRA Tank Units 40.17, 40.18, and 40.19 are also known as Tanks T-1, T-2, and T-3, respectively. RCRA Tank Units 40.17, 40.18, and 40.19 also include secondary containment structures, ancillary equipment, and piping located in, and connecting the system between Buildings 865 and 866. The Division prepared and e-mailed comments on or about February 25, 2002 regarding this RSOP notification package for closure of these RCRA tank units. As documented in the attached contact record, a discussion was held on May 9, 2002 between Kim Myers of Kaiser-Hill and James Hindman of the Division and the Division's comments were resolved during the discussion. Additionally, it was agreed during this May 9, 2002 discussion that since decontamination had been attempted for these tanks and ancillary equipment, they could be characterized and disposed of as non-hazardous waste based on analytical results.

We hereby formally agree that the appropriate activities described in the notification may proceed utilizing the Component RSOP, with the following conditions:

1. Sump 145A in B865 must be closed as documented in the May 9, 2002 contact record between Kim Myers of Kaiser-Hill and James Hindman of the Division. For any other concrete secondary containment structures associated with these RCRA Tank Units, the application of Clean Closure Option #3 under Section 5.1.1 of the Component RSOP will require either:
    a. a demonstration that an impermeable coating was maintained in good condition on the concrete secondary containment throughout the life of the unit, or
    b. verification sampling and analysis of the remaining concrete for hazardous waste constituents that were managed within RCRA Tank Units 40.17, 40.18, and 40.19.

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2. It will be necessary to thoroughly evaluate the secondary containment in Buildings 865 and 866 for potential pathways (e.g., cracks, seams, etc.) for migration of contamination to the underlying soils. The results of this evaluation and the closure verification analysis of the remaining concrete (see condition #1 above) will need to be considered in determining whether or not additional soil sampling will be necessary.

3. It is stated in your letter that, "This work will be conducted in accordance with the work control documentation prepared by the subcontractor." The utilization of the approved Component RSOP includes the implementation of the work control process as provided therein. As such, the subcontractor's work control process must adhere to that described in the Component RSOP, or it must be shown to be equivalent. Any variation from the work control process as described and approved in the Component RSOP must be identified and appropriate rationale provided for our approval.

4. Work control documentation for the closure activities of RCRA Tank Units 40.17, 40.18, and 40.19 must describe precautions that will be taken during dismantlement of the units to prevent the release of any residual liquids that may remain in the units. The work control documentation must also describe how any residual liquids encountered will be properly characterized and subsequently managed.

5. As described in the May 9, 2002 contact record between Kim Myers of Kaiser-Hill and James Hindman of the Division, the sump in Building 866 and anything in the sump below the metal plate/cover will be removed and properly characterized as LLM waste, unless further information is discovered that documents the RCRA closure of this sump.

6. In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division. The certification of closure will need to be signed by the facility and by an independent Colorado registered professional engineer (P.E.) in accordance with the requirements of the approved Closure Plan and Section 264.115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed. Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P.E. will be involved in the closure process to the extent necessary to adequately certify closure.

As indicated in your letter, the consultative process must be utilized to keep us informed of the decommissioning strategy, planning, and activities for this project. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or James Hindman at (303) 692-3345.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc:
S. MacLeod, DOE-RFFO
S. Tower, DOE-RFFO
T. Rehder, EPA
K. Dorr, K-H
F. Gibbs, K-H RISS
K. Kehler, K-H RISS
~~S. Nesta, K-H RISS~~
A. Rosenman, K-H
D. Shelton, K-H
D. Miller, AGO
D. Kruchek, CDPHE
Administrative Record, Building T-130G

102

Article 3

April 29, 2003, Facility Component RSOP – Removal of a portion of the exterior wall

Revised 02/03

CORRES. CONTROL INCOMING LTR NO.

00426 RF03

DUE DATE

ACTION

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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Colorado Department of Public Health and Environment

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.		
POWERS, K. P.		
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.		
WILLIAMS, J. L.		
PARSONS, D.	X	
LESINSKI, M.	X	
NESTA, S.	X	
BUTLER, L.	X	

COR. CONTROL	X	
ADMIN. RECORD	X	
PATS/130		

Reviewed for Addressee Corres. Control RFP

5/5/03 by
Date By

Ref. Ltr. #

DOE ORDER #
5400.1

April 29, 2003

Mr. Richard DiSalvo
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Building 865 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP) for removal of a portion of the exterior wall – concurrence

Dear Mr. DiSalvo:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has received your April 8, 2003 letter, received on April 15, 2003, notifying us of your intent to utilize the Component RSOP for removal of a contaminated portion of the Building 865 exterior wall prior to demolition of the facility. Based on the information provided and discussed, appropriate measures should be performed to prevent releases of contamination during and after completion of this activity. As such, we hereby concur that this activity, removal of the asbestos "blast panels", may proceed utilizing the Component RSOP.

As indicated in your letter the consultative process will be utilized to provide information, including the Work Control Documents, as well as to keep us informed of the decommissioning strategy or any changes thereto prior to performing this or other decommissioning activities.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson for
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Administrative Records Building T130G
Mark Lesinski, KH
Dave Shelton, KH
Steve Nesta, KH

104

Article 4

August 22, 2003, Facility Disposition RSOP– Demolition of Building 865

105

Revised 07/03

CORRES. CONTROL
INCOMING LTR NO.

00809 RF03

DUE DATE
ACTION

RECEIVED
2003 AUG 27 P 3:11
CORRESPONDENCE CONTROL

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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Colorado Department of Public Health and Environment

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DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRIL, M. S.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.		
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
PARSONS, D.	X	
BUTLER, L.	X	
WIEMELT, K.	X	
NESTA, S.	X	
BROOKS, L.	X	

COR. CONTROL	X	
ADMN. RECORD	X	
PATS/130		

August 22, 2003

Mr. Joseph Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: B865 Facility Disposition RSOP Notification

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your August 14, 2003 letter notifying us that the Facility Disposition RSOP will be utilized during the demolition of B865. We hereby agree that B865 may be demolished utilizing the Facility Disposition RSOP, with the following restrictions:

1. The activity to be performed per this notification includes the superstructure and not the floor/slab of B865. The demolition of the floor/slab will be performed after submittal of a separate RSOP Notification.
2. It must be recognized that even though the beryllium has been fixed, the superstructure of B865 will still need to be managed as beryllium contaminated waste, as indicated in the PDSR.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Lane Butler, KH
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records Building T130G

Reviewed for Addressee
Corres. Control RFP

8/27/03 bg
Date By

Ref. Ltr. #

DOE ORDER #
NONE

106

Article 5

January 31, 2002, Facility Component RSOP – Component removal and decontamination activities

107

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Colorado Department
of Public Health
and Environment

January 31, 2002

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Building 866 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your letter dated January 17, 2002, received on January 28, 2002, notifying us of your intent to utilize the Component RSOP for component removal, size reduction, and decontamination activities, not associated with the RCRA Units, to occur in Building 866. We hereby agree that the appropriate non-RCRA related activities may proceed utilizing the Component RSOP.

As stated in your letter, the notification for work to be performed under the Component RSOP for the RCRA units will be provided in a separate letter. Although the non-RCRA activities may proceed utilizing the Component RSOP, specific distinctions between RCRA and non-RCRA components have not been provided. As such, the consultative process will need to be utilized to keep us informed of the decommissioning strategy and activities to occur prior to providing the RCRA notification and prior to performing these activities.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, RFFO
Tim Rehder, EPA
Kent Dorr, KH
Frank Gibbs, KH
Dave Shelton, KH
Dyan Foss, KH
Administrative Records Building 850

1/1

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE
CEX-072-99

ADMIN RECORD

B865-A-000023

108

Article 6

June 7, 2002, Facility Component RSOP – Closure of RCRA Tank Units 40.17, 40.18, and 40.19 in Buildings 865 and 866

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Colorado Department
of Public Health
and Environment

June 7, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of RCRA Tank Units 40.17, 40.18, and 40.19 in Buildings 865 and 866

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed your February 12, 2002 letter and the accompanying notification package received on February 15, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of the remaining portions of interim status RCRA Tank Units 40.17, 40.18, and 40.19 located in Buildings 865 and 866. RCRA Tank Units 40.17, 40.18, and 40.19 are also known as Tanks T-1, T-2, and T-3, respectively. RCRA Tank Units 40.17, 40.18, and 40.19 also include secondary containment structures, ancillary equipment, and piping located in, and connecting the system between Buildings 865 and 866. The Division prepared and e-mailed comments on or about February 25, 2002 regarding this RSOP notification package for closure of these RCRA tank units. As documented in the attached contact record, a discussion was held on May 9, 2002 between Kim Myers of Kaiser-Hill and James Hindman of the Division and the Division's comments were resolved during the discussion. Additionally, it was agreed during this May 9, 2002 discussion that since decontamination had been attempted for these tanks and ancillary equipment, they could be characterized and disposed of as non-hazardous waste based on analytical results.

We hereby formally agree that the appropriate activities described in the notification may proceed utilizing the Component RSOP, with the following conditions:

1. Sump 145A in B865 must be closed as documented in the May 9, 2002 contact record between Kim Myers of Kaiser-Hill and James Hindman of the Division. For any other concrete secondary containment structures associated with these RCRA Tank Units, the application of Clean Closure Option #3 under Section 5.1.1 of the Component RSOP will require either:
    a. a demonstration that an impermeable coating was maintained in good condition on the concrete secondary containment throughout the life of the unit, or
    b. verification sampling and analysis of the remaining concrete for hazardous waste constituents that were managed within RCRA Tank Units 40.17, 40.18, and 40.19.

110

2. It will be necessary to thoroughly evaluate the secondary containment in Buildings 865 and 866 for potential pathways (e.g., cracks, seams, etc.) for migration of contamination to the underlying soils. The results of this evaluation and the closure verification analysis of the remaining concrete (see condition #1 above) will need to be considered in determining whether or not additional soil sampling will be necessary.

3. It is stated in your letter that, "This work will be conducted in accordance with the work control documentation prepared by the subcontractor." The utilization of the approved Component RSOP includes the implementation of the work control process as provided therein. As such, the subcontractor's work control process must adhere to that described in the Component RSOP, or it must be shown to be equivalent. Any variation from the work control process as described and approved in the Component RSOP must be identified and appropriate rationale provided for our approval.

4. Work control documentation for the closure activities of RCRA Tank Units 40.17, 40.18, and 40.19 must describe precautions that will be taken during dismantlement of the units to prevent the release of any residual liquids that may remain in the units. The work control documentation must also describe how any residual liquids encountered will be properly characterized and subsequently managed.

5. As described in the May 9, 2002 contact record between Kim Myers of Kaiser-Hill and James Hindman of the Division, the sump in Building 866 and anything in the sump below the metal plate/cover will be removed and properly characterized as LLM waste, unless further information is discovered that documents the RCRA closure of this sump.

6. In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division. The certification of closure will need to be signed by the facility and by an independent Colorado registered professional engineer (P.E.) in accordance with the requirements of the approved Closure Plan and Section 264.115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed. Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P.E. will be involved in the closure process to the extent necessary to adequately certify closure.

As indicated in your letter, the consultative process must be utilized to keep us informed of the decommissioning strategy, planning, and activities for this project. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or James Hindman at (303) 692-3345.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc: S. MacLeod, DOE-RFFO
S. Tower, DOE-RFFO
T. Rehder, EPA
K. Dorr, K-H
F. Gibbs, K-H RISS
K. Kehler, K-H RISS
~~S. Nesta, K-H RISS~~
A. Rosenman, K-H
D. Shelton, K-H
D. Miller, AGO
D. Kruchek, CDPHE
Administrative Record, Building T-130G

111

Article 7

October 9, 2003, Facility Disposition RSOP – Demolition of Building 866

112

RECEIVED

2003 OCT 15 A 9:35

CORRESPONDENCE CONTROL

STATE OF COLORADO

Revised 10/03

CORRES. CONTROL INCOMING LTR NO.

00949 RF03

DUE DATE

ACTION

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
BROOKS, L.	X	
BUTLER, L.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
HIETT, S. B.	X	
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
ZAHM, C.	X	
Parsons, D	X	
Wiemelt, K	X	
Nesta, S	X	

COR. CONTROL	X	
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee Corres. Control RFP

10/15/03 Date

By

Ref. Ltr. #

DOE ORDER #
5400.1

Bill Owens, Governor
Douglas H. Benevento, Executive Director
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4300 Cherry Creek Dr. S.
Denver, Colorado 80246-1530
Phone (303) 692-2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

http://www.cdphe.state.co.us

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department of Public Health and Environment

October 9, 2003

Mr. Joseph Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: B866 Facility Disposition RSOP Notification

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your October 9, 2003 letter notifying us that the Facility Disposition RSOP will be utilized during the demolition of B866. We hereby agree that B866 may be demolished utilizing the Facility Disposition RSOP with the exception that the floor and sump are not free-releasable, but will be sprayed with fixative and the floor disposed as LLW and the sump disposed as LLMW (as previously discussed and agreed per the September 22, 2003 Contact Record, and as identified in the PDSR).

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
~~Administrative Records Building T130G~~
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

113

Article 8

November 29, 2001, Facility Component RSOP – Component removal and decontamination activities

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

November 29, 2001

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Buildings 867 & 868 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has received your November 27, 2001 letter notifying us of your intent to utilize the Component RSOP for component removal and decontamination activities that are to occur in Buildings 867 and 868. We hereby agree that the appropriate activities may proceed utilizing the Component RSOP.

Considering that Buildings 867 and 868 are the filter plenums for Building 865, the decommissioning activities planned in these buildings need to be coordinated with the decommissioning of Building 865 so that these decommissioning activities are *not performed until the plenums* are no longer needed by B865. As indicated in your letter the consultative process will be utilized to keep us informed of the decommissioning strategy prior to performing the decommissioning activities.

It is stated in the last sentence of your letter that the facility will not be breached by the proposed decommissioning activities. However, in the Component Removal checklist, floors are checked. Removal of the floor will breach the building shell. Therefore, it is our understanding that removal of the floors will not be performed as part of the Component RSOP activities included in this notice.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, RFFO
Tim Rehder, EPA
Kent Dorr, KH
Frank Gibbs, KH
Dave Shelton, KH
Dyan Foss, KH
Administrative Records Building 850

Article 9

October 8, 29, 2001, Facility Disposition RSOP – Demolition of Building 867

116

RECEIVED

2003 OCT 15 A 9:40

CORRESPONDENCE CONTROL

Revised 10/03

CORRES. CONTROL
INCOMING LTR NO.

00955 RF 03

DUE DATE

ACTION

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
BROOKS, L.	X	
BUTLER, L.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
GIACOMINI, J. J.		
HIETT, S. B.	X	
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
ZAHM, C.	X	
Parsons, D	X	
Wiemelt, K	X	
Nesta, S	X	

COR. CONTROL	X	
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

10/15/03 Date — By

Ref. Ltr. #

DOE ORDER #
5400.1

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department of Public Health and Environment

October 8, 2003

Mr. Joseph Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: B867 Facility Disposition RSOP Notification

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your October 6, 2003 letter notifying us that the Facility Disposition RSOP will be utilized during the demolition of B867. Based on information contained in the PDSR and numerous discussions, captured in several Contact Records, we previously agreed that with appropriate safeguards B867 could be (and has been) demolished utilizing the Facility Disposition RSOP.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH
Administrative Records Building T130G

117

Article 10

November 29, 2001, Facility Component RSOP – Component removal and decontamination activities

118

STATE OF COLORADO

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Jane E. Norton, Executive Director

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Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090

Colorado Department
of Public Health
and Environment

November 29, 2001

Mr. Joseph A Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Buildings 867 & 868 notification of intent to invoke the Facility Component Removal, Size Reduction, and Decontamination Activities RSOP (Component RSOP)

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has received your November 27, 2001 letter notifying us of your intent to utilize the Component RSOP for component removal and decontamination activities that are to occur in Buildings 867 and 868. We hereby agree that the appropriate activities may proceed utilizing the Component RSOP.

Considering that Buildings 867 and 868 are the filter plenums for Building 865, the decommissioning activities planned in these buildings need to be coordinated with the decommissioning of Building 865 so that these decommissioning activities are not performed until the plenums are no longer needed by B865. As indicated in your letter the consultative process will be utilized to keep us informed of the decommissioning strategy prior to performing the decommissioning activities.

It is stated in the last sentence of your letter that the facility will not be breached by the proposed decommissioning activities. However, in the Component Removal checklist, floors are checked. Removal of the floor will breach the building shell. Therefore, it is our understanding that removal of the floors will not be performed as part of the Component RSOP activities included in this notice.

If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, RFFO
Tim Rehder, EPA
Kent Dorr, KH
Frank Gibbs, KH
Dave Shelton, KH
Dyan Foss, KH
Administrative Records Building 850

Article 11

August 22, 2003, Facility Disposition RSOP – Demolition of Building 868

120

Revised 07/03

CORRES. CONTROL
INCOMING LTR NO.

00811 RF03

DUE DATE
ACTION

DIST.	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
CROCKETT, G. A.	X	
DECK, C. A.		
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.	X	
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.		
PARKER, A. M.	X	
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.	X	
WILLIAMS, J. L.		
PARSONS, D.	X	
WIEMELT, K.	X	
NESTA, S.	X	
BROOKS, L.	X	

COR. CONTROL	X	
ADMIN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP

8/27/03 by
Date By

Ref. Ltr. #

DOE ORDER #
NONE

RECEIVED
2003 AUG 21 P 3 17
CORRESPONDENCE CONTROL

STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Executive Director

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(303) 692-3090

Colorado Department
of Public Health
and Environment

August 22, 2003

Mr. Joseph Legare
Assistant Manager for Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: B868 Facility Disposition RSOP Notification

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed your August 14, 2003 letter notifying us that the Facility Disposition RSOP will be utilized during the demolition of B868. We hereby agree that B868 may be demolished utilizing the Facility Disposition RSOP.

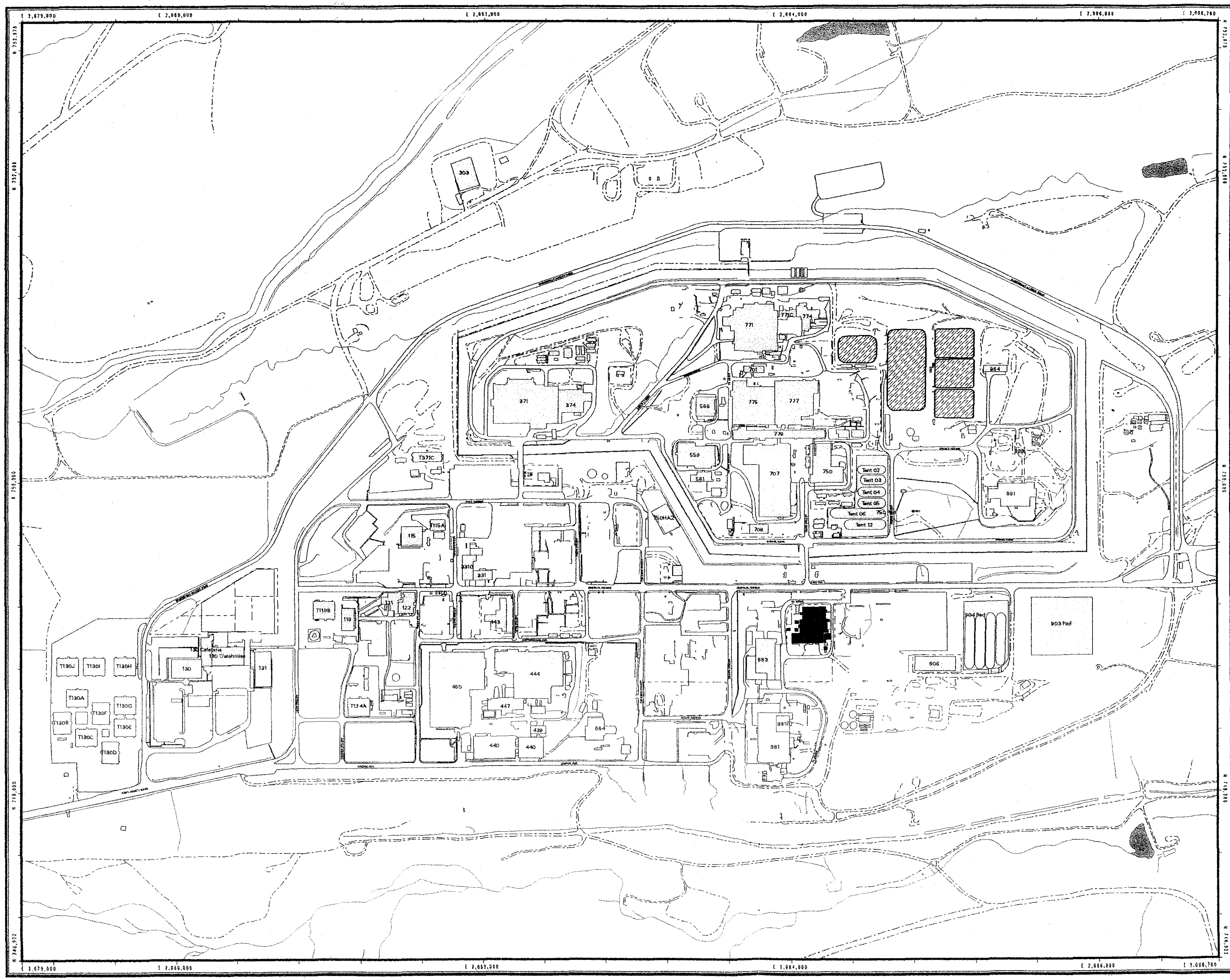
If you have any questions regarding this correspondence please contact me at (303) 692-3367 or David Kruchek at (303) 692-3328.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

cc: Steve Tower, DOE
Tim Rehder, EPA
Duane Parsons, KH
Administrative Records Building T130G
Karen Wiemelt, KH
Dave Shelton, KH
Steve Nesta, KH

12/1/21



Rocky Flats Environmental Technology Site

Final Closeout Report
Building 865
Appendix 1, Article 1

B865 Cluster

Standard Map Features

Buildings and other structures

Solar Evaporation Ponds (SEPs)

Lakes and ponds

Streams, ditches, or other drainage features

Fences and other barriers

Rocky Flats Environmental Technology Site boundary

Paved roads

Dirt roads

DATA SOURCE BASE FEATURES:
Buildings, fences, hydrography, roads and other structures from 1994 aerial fly-over data captured by EG&G RSL, Las Vegas.
Digitized from the orthophotographs. 1/95

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N

Scale = 1 : 7810
1 inch represents approximately 651 feet

200 0 400 800 ft

State Plane Coordinate Projection
Colorado Central Zone
Datum: NAD27

U.S. Department of Energy
Rocky Flats Environmental Technology Site

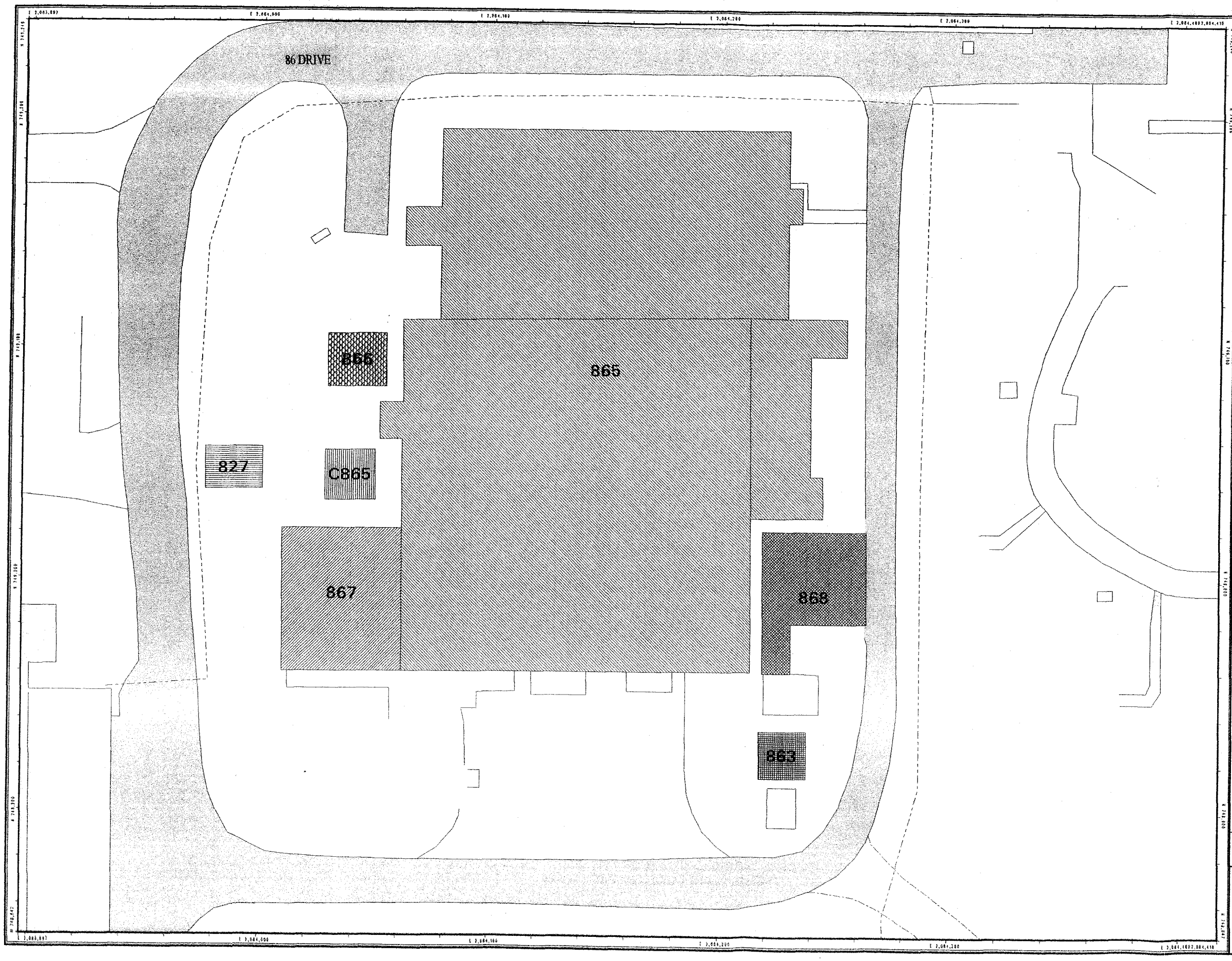
GIS Dept. 303-966-7707

Prepared by: CH2MHILL

Prepared for: KAISER•HILL COMPANY

December 03, 2003

NT_Svr w:/projects/fy2004/04-0123/b865_location_bsize.aml



Rocky Flats Environmental Technology Site

Final Closeout Report
Building 865
Appendix 1, Article 2

- Building 827
- Building 865
- Building 867
- Building 868
- Building 866
- Building 863
- Building C865

Standard Map Features

- Buildings and other structures
- Paved roads fill
- Fences and other barriers
- Rocky Flats Environmental Technology Site boundary
- Paved roads
- Dirt roads

DATA SOURCE BASE FEATURES:
Buildings, fences, hydrography, roads and other structures from 1994 aerial flyover data captured by EG&G RSL, Las Vegas. Digitized from the orthophotographs, 1/95

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Scale = 1 : 510
1 inch represents approximately 43 feet

10 0 20 40ft

State Plane Coordinate Projection
Colorado Central Zone
Datum: NAD27

U.S. Department of Energy
Rocky Flats Environmental Technology Site

GIS Dept. 303-966-7707

Prepared by: CH2MHILL Communications Group

Prepared for: KAISER•HILL COMPANY

January 22, 2004

M:T_Svr w:/projects/fy2004/04-0123/b865_detailed_bsize.ami

26